LOS ANGELES
DEPARTMENT OF CITY
PLANNING
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DRAFT
ENVIRONMENTAL IMPACT REPORT

Hollywood Center Project

Environmental Case: ENV-2018-2116-EIR
State Clearinghouse No.: 2018051002

Project Location: 1720-1724, 1740-1768, 1745-1753, and 1770 North Vine Street; 1746-1764 North Ivar Avenue; 1733-1741 North Argyle Avenue; 6236, 6270, and 6334 West Yucca Street, Los Angeles, CA 90028.

Community Plan Area: Hollywood

Council District: 13—O'Farrell

Project Description: The Hollywood Center Project is a new mixed-use development on an approximately 4.46-acre site, generally bounded by Yucca Street on the north, Ivar Avenue on the west, Argyle Avenue on the east, and Hollywood Boulevard on the south, and bifurcated by Vine Street. The portion of the Project Site located between Ivar Avenue and Vine Street is identified as the "West Site", and the portion located between Vine Street and Argyle Avenue is identified as the "East Site". The Project Site is currently developed with a single-story building and surface parking on the West Site; and the Capitol Records Building and Gogerty Building occupied by Capitol Records (the Capitol Records Complex), and surface parking on the East Site. Under the Project, the existing building on the West Site would be demolished and the Capitol Records Complex would be preserved, and the remainder of the Project Site would be redeveloped with 1,005 residential units, comprised of 872 market-rate and 133 senior affordable units, and up to 30,176 square feet of commercial uses, within four new mixed-use buildings (West Building, East Building, West Senior Building, East Senior Building) which range in height from 11 to 46 stories. Overall, the Project would contain up to 1,287,150 square feet of floor area, for a floor area ratio (FAR) of 6.973:1. Under a proposed East Site Hotel Option (Project with the East Site Hotel Option), 104 residential units within the East Building would be replaced with a hotel, with no change to the building height or massing. Overall, the Project with the East Site Hotel Option would contain 884 residential units, comprised of 768 market-rate and 116 senior affordable units; a 220-room hotel with supporting amenities; and up to 30,176 square feet of commercial uses. Overall, the Project with the East Site Hotel Option would contain up to 1,272,741 square feet of floor area, for a FAR of 6.901:1. The Project is an Environmental Leadership Development Project (ELDP) under Assembly Bill 900, certified by the Governor on August 16, 2018.

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

PREPARED BY:
ESA

APPLICANT:
MCAF Vine LLC, 1750 North Vine LLC, 1749 North Vine Street LLC,
1770 Ivar LLC, 1733 North Argyle LLC, and 1720 North Vine LLC

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Executive Summary

The purpose of this Draft Environmental Impact Report (EIR) is to inform decision-makers and the general public of the potential environmental impacts resulting from the proposed Hollywood Center Project (Project). The Project will require certain discretionary approvals by the City and potentially other governmental agencies and is subject to environmental review requirements under the California Environmental Quality Act (CEQA). The Project is an Environmental Leadership Development Project (ELDP) under the Environmental Leadership Act of 2011 (Assembly Bill [AB] 900, as amended by SB 743 [2013] and SB 734 [2016], which is codified in Sections 21178 through 21189.3 of the California Public Resources Code [PRC]). This act established specified procedures for the judicial review of the EIR for development projects that are certified by the Governor as ELDP.

As described in Section 15123(a) and 15362 of the CEQA Guidelines, an EIR is an informational document that will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable project alternatives. Therefore, the purpose of this Draft EIR is to focus the discussion on the Project's potential environmental effects that the City of Los Angeles (City), as the Lead Agency, has determined to be, or potentially may be significant. In addition, feasible mitigation measures are recommended, when applicable, that could reduce or avoid the Project's significant environmental impacts.

This Draft EIR has been prepared pursuant to the requirements of the CEQA (PRC Sections 21000 *et. seq.*) with respect to the Project. In accordance with Section 15123 of the CEQA Guidelines, this chapter of the EIR provides a brief description of the Project, identifies significant effects and proposed mitigation measures or alternatives that would reduce or avoid those effects, describes areas of controversy known to the Lead Agency and issues to be resolved, summarizes alternatives, and summarizes environmental impacts.

1. Project Location

The Project Site is an approximately 4.46-acre (194,495-square-foot) property located in the Hollywood Community Plan area of the City of Los Angeles (City). The Project Site is generally bounded by Yucca Street on the north, Ivar Avenue on the west, Argyle Avenue on the east, and adjacent development and Hollywood Boulevard on the south, and is bifurcated by Vine Street. The portion of the Project Site located between Ivar Avenue and Vine Street is identified as the "West Site", and the portion located between Vine Street and Argyle Avenue is identified as the "East Site". The Project Site is comprised of 10 individual parcels and currently

occupied by a building leased by the American Musical and Dramatic Academy (AMDA) for storage (no educational/campus activities/classes), and a surface parking lot on the West Site; and the Capitol Records Building and Gogerty Building (i.e., the Capitol Records Complex), occupied by Capitol Records, a surface parking lot that serves the Capitol Records Complex, and general public parking on the East Site.

2. Proposed Project

The Project would preserve the Capitol Records Complex and remove the remaining existing uses on the Project Site, including most of the surface parking areas and the single-story building leased by AMDA for storage purposes. The southeastern portion of the existing surface parking adjacent to the Capitol Records Complex contains 97 vehicle parking spaces, which would be retained and relocated.[1] In addition, a five-level subterranean parking garage with one additional level of enclosed at-grade parking would be provided on both the West Site and the East Site.

The remaining surface parking on the Project Site would be removed in order to develop the Project's proposed mix of land uses. Overall, the Project would contain approximately 1,287,150 square feet of developed floor area, including:

- Residential uses (1,005 residential housing units comprised of 872 market-rate and 133 senior affordable housing units), for a total of approximately 1,256,974 square feet;
- Commercial uses (retail and restaurant uses) for a total of approximately 30,176 square feet;
- Open space (publicly accessible open space, outdoor common open space, indoor common open space, and private balconies), for a total of approximately 166,582 square feet;
- Vehicle parking (up to 1,521 spaces); and
- Bicycle parking (up to 551 spaces).2

The residential and commercial uses would be located within four new buildings: a 35-story building on the West Site (West Building); a 46-story building on the East Site (East Building); and two 11-story senior housing buildings, one on each site (West Senior Building and East Senior Building), set aside for Extremely Low and/or Very Low Income households.

1 The 97 spaces reserved for the Capitol Records Complex are based on an existing Certificate of Occupancy for Capitol Records and is defined by the amount of parking that the City requires.

2 The number of bicycle parking spaces is consistent with Ordinance No. 185,480, which was adopted by the Los Angeles City Council on March 27, 2018 under Council File No. 12-1297-S1, and became effective on May 9, 2018.

Under a proposed East Site Hotel Option (Project with the East Site Hotel Option), the Project would replace 104 residential units within the East Building on Levels 3 through 12, with a 220-room hotel, with no change to the building height and massing. The number of affordable residential units within the East Senior Building would be reduced by 17 units and the height of the building would be reduced from 11 stories to nine stories. Overall, the Project with the East Site Hotel Option would contain approximately 1,272,741 square feet of developed floor area, including:

- Residential uses (884 residential housing units, comprised of 768 market-rate and 116 senior affordable housing units), for a total of approximately 1,112,287 square feet;
- Hotel use (a 220-room hotel and supporting amenities), for a total of approximately 130,278 square feet;
- Commercial uses (retail and restaurant uses), for a total of approximately 30,176 square feet;
- Open space (publicly accessible open space, outdoor common open space, indoor common open space, and private balconies), for a total of approximately 150,371 square feet;
- Vehicle Parking (up to 1,521 spaces); and
- Bicycle Parking (up to 554 spaces).

3. Public Review Process

As further described in Chapter I, *Introduction*, of this Draft EIR, the City circulated a Notice of Preparation (NOP) to State, regional, and local agencies, interested organizations, and members of the public for a 30-day period, commencing August 28, 2018, and ending September 27, 2018. The purpose of the NOP was to formally convey that the City was preparing a Draft EIR for the Project and to solicit input regarding the scope and content of the Draft EIR. The NOP and Initial Study are provided in Appendices A-1 and A-2 of this Draft EIR.

In addition, a public scoping meeting was held on September 12, 2018, from 6:00 P.M. to 8:00 P.M. at the First Presbyterian Church of Hollywood, located at 1760 N. Gower Street, Los Angeles, CA 90028. Scoping meeting materials, letters and comments received during the comment period, and comments received during the public scoping meeting are included in Appendices A-3 and A-4 of this Draft EIR. This Draft EIR is being circulated for a 47-day public comment period starting on April 16, 2020 and ending on June 1, 2020. Following the public comment period, a Final EIR will be prepared that includes responses to comments received on the Draft EIR.

4. Areas of Controversy/Issues to Be Resolved

The following summarizes the environmental concerns raised in response to the NOP, including comments received at the public scoping meeting held during the NOP circulation period. Public comments are included in Appendix A-4 and include the following general topics:

- Blocked views and shade impacts on nearby uses due to scale and massing of the Project
- Worsened air quality, greenhouse gas, noise, and traffic impacts resulting from Project construction
- Impacts on the historic resources on- and off-site, such as the Capitol Records Complex, Pantages Theatre, and Hollywood Boulevard
- Rupture of an earthquake fault due to Project Site's location within a designated Alquist-Priolo Earthquake Fault Zone
- Land use inconsistencies between the Project and plans regulating the Project Site
- Increased traffic impacts and exacerbated parking conditions in the nearby area due to the Project
- Cumulative growth in the Hollywood area leading to gentrification
- Increased stress on existing public services availability and aging infrastructure (e.g., wastewater, police, fire)

5. Significant and Unavoidable Environmental Impacts

Based on the analysis contained in Chapter IV, *Environmental Impact Analysis*, the Project would result in significant and unavoidable impacts with regard to:

1) Cultural Resources: Project-level and cumulative structural vibration impacts during construction to off-site historic architectural resources.

2) Noise and Vibration:

   i) Construction Noise – Project-level and cumulative noise impacts to off-site noise sensitive receptors from on-site construction activities and off-site vehicle and truck travel.

   ii) Construction Vibration – Project-level and cumulative structural vibration impacts to adjacent off-site buildings, and human annoyance vibration impacts to adjacent sensitive receptors.

The Project would not result in any significant and unavoidable operational impacts. Detailed analysis is provided in Chapter IV, *Environmental Impact Analysis*, of this Draft EIR.

6. Alternatives to Reduce Significant Impacts

CEQA Guidelines Section 15126.6(a) requires an EIR to "describe the range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but will avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." The CEQA Guidelines emphasize that the selection of project alternatives should be based primarily on the ability to reduce significant impacts relative to the proposed project, "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."[3] The CEQA Guidelines further direct that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are analyzed.[4] Based on an analysis of these alternatives, an environmentally superior alternative is identified.

a) Alternative 1: No Project/No Build Alternative

In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. CEQA Guidelines Section 15126.6(e)(3)(B) states that, "in certain instances, the No Project/No Build Alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, the No Project/No Build Alternative (Alternative 1) assumes that no new development would occur within the Project Site. The portion of the Project Site that would have been occupied by the Project would continue to operate as paved surface parking lots and a small storage building (West Site) and the Capitol Records Complex (East Site).

b) Alternative 2: Development under Existing Zoning Alternative

The Development Under Existing Zoning Alternative (Alternative 2) would conform to the Project Site's existing zoning designation. The development of Alternative 2 with a mix of residential, retail, and restaurant uses would be similar to the Project, although residential uses would be proportionally reduced to reflect the reduction in floor area ratio (FAR) from 6.973:1 over the Project Site under the Project to 3:1, except for a small section in the northwest corner of the West Site, which would be developed to an FAR of 2:1. Alternative 2 would be developed with a total of 30,176 square feet of retail and restaurant uses, which is the same as the floor area of

[3] CEQA Guidelines, Section 15126.6(b).
[4] CEQA Guidelines, Section 15126.6(f).

retail and restaurant uses provided by the Project. Alternative 2 would include approximately 36,141 square feet of publicly accessible open space at the ground level, which would form a paseo through the Project Site. No performance stage would be located within the paseo off of Vine Street on the East Site. Alternative 2 would provide a total of 384 market-rate residential units and no senior affordable units. Alternative 2's residential component would be provided within two high-rise buildings, one each on the East Site and West Site, respectively. Each building would provide 192 market-rate residential units. The East Building would be 18 stories and reach a height of 243 feet at the top of the 18th story and 293 feet at the top of the bulkhead. The West Building would be 14 stories and reach a height of 195 feet at the top of the 14th story and 235 feet at the top of the bulkhead. The senior affordable buildings would not be constructed under Alternative 2 as this is zoning compliant alternative does not trigger Measure JJJ [Los Angles Municipal Code (LAMC) Section 11.5.11)]. A three-level subterranean parking structure containing 300 spaces would be provided on the East Site, and a two-level subterranean parking structure containing 193 parking spaces would be provided on the West Site, for a total of 493 parking spaces. Vehicle and bicycle parking would be provided in accordance with LAMC requirements. The total floor area for Alternative 2 would be approximately 480,516 square feet, which would result in an FAR of 2.96:1, and represent an approximately 62.7-percent reduction in the Project's total floor area and a 62.3-percent reduction compared to the Project with the East Site Hotel Option.[5]

c) Alternative 3: Reduced Maximum Height Alternative

Development under the Reduced Maximum Height Alternative (Alternative 3) would limit maximum building heights to 23 stories on the East Site and 22 stories on the West Site. Alternative 3 would incorporate 30,176 square feet of retail and restaurant uses distributed over the East and West Sites. Alternative 3 would provide both market-rate and senior affordable housing as under the Project but at a reduced number to reflect the incremental reduction in floor area. Alternative 3 would provide 349 market-rate units and 53 senior affordable units on the East Site and 478 market-rate units and 72 senior affordable units on the West Site, for a total of 827 market-rate units and 125 senior affordable units. Alternative 3's residential component would be provided within four buildings, two each on the East Site and West Site, respectively. The East Building would reach a height of 303 feet at the top of the 23rd story and 353 feet at the top of the bulkhead. The West Building would be 22 stories and reach a height of 292.5 feet at the top of the 22nd story and 332.5 feet at the top of the bulkhead. The East Senior Building would be eight stories and would reach a height of 105 feet at the top of the 8th

[5] The average FAR for Alternative 2 is based on the combined allowance of 3:1 FAR on the majority of the Project Site, and 2:1 FAR on a small section in the northwest corner of the Project Site.

story and 125 feet at the top of the bulkhead. The West Senior Building would be 134 feet at the top of the 11th story and reach a maximum height of 154 feet at the top of the bulkhead. Alternative 3 would be developed with a total of 35,664 square feet of publicly accessible open space at the ground level, which would form a paseo through the East Site and a plaza accessible from Vine Street on the West Site. No performance stage would be located within the paseo off of Vine Street on the East Site. The total new floor area for Alternative 3 would be approximately 1,097,466 square feet, which would result in an FAR of 6.031:1, and represent an approximate 14.7-percent reduction in the Project's floor area. A five-level subterranean parking structure containing 684 spaces would be provided on the East Site, and a five-level subterranean parking structure containing 699 parking spaces would be provided on the West Site, for a total of 1,383 parking spaces. Alternative 3 would result in shorter buildings with broader footprints and would, thus, reduce the Project's building setbacks. Vehicle and bicycle parking would be provided to in accordance with LAMC requirements.

d) Alternative 4: Office, Hotel and Commercial Alternative

The Office, Hotel and Commercial Alternative (Alternative 4) would incorporate retail and restaurant floor area, as under the Project. Approximately 17,485 square feet of retail and restaurant uses would be provided on the East Site, and approximately 12,692 square feet of retail and restaurant uses would be provided on the West Site, for a total of 30,176 square feet of retail and restaurant uses. Alternative 4 would also include the development of a 324-room hotel on the East Site and a 603,060-square-foot office building on the West Site. Unlike the Project, Alternative 4 would not provide any residential uses. The hotel and office components under Alternative 4 would be provided within two high-rise buildings, one each on the East Site and West Site, respectively. The hotel building on the East Site would be 12 stories and reach a height of 172 feet at the top of the 12th story and 222 feet at the top of the bulkhead. The office building on the West Site would be 20 stories and reach a height of 320 feet at the top of the 20th story and 360 feet at the top of the bulkhead. Alternative 4 would be developed with a total of 32,657 square feet of publicly accessible open space at the ground level, which would form a paseo through the East Site and a plaza accessible from Vine Street on the West Site. No performance stage would be located within the paseo off of Vine Street on the East Site. The total new floor area for Alternative 4 would be approximately 789,967 square feet, which would result in an FAR of 4.501:1 and represent an approximate 38.6-percent reduction in the Project's floor area. A five-level subterranean parking structure containing 624 spaces would be provided on the East Site, and a five-level subterranean parking structure containing 837 parking spaces would be provided on the West Site, for a total of 1,461 parking spaces. Vehicle and bicycle parking would be provided in accordance with LAMC requirements.

e) Alternative 5: Proposed Community Plan Update-Compliant Alternative

The Proposed Community Plan Update-Compliant Alternative (Alternative 5) would develop the Project Site in accordance with the proposed zoning designation for the Project Site in accordance with the Hollywood Community Plan Update (HCPU2). The Proposed HCPU2 would change the zoning of the Project Site from its existing C2-2D-SN zone to (Q)C4-2D-SN-CPIO. The Project Site would be designated as Subarea 4:3, in which residential uses shall only be permitted if a project incorporates a minimum 0.5:1 FAR of non-residential uses, and the total floor area of all buildings or structures on a lot shall not exceed an FAR of 4.5:1. A project may exceed the 4.5:1 FAR provided that it is approved by the City Planning Commission, or the City Council on appeal, pursuant to the procedures set forth in LAMC 12.32 D and that the project conforms with Hollywood Community Plan policies.

The CPIO designation (Community Plan Implementation Overlay) focuses on historic preservation and pedestrian-oriented design. The CPIO would have regulatory protections for designated historical resources, including prohibitions on obtaining a demolition permit for all buildings or structures that are 45 years or older. The CPIO also requires pedestrian-oriented design standards for commercially-zoned properties, which include ground-floor retail, window transparency, attractive street frontages, and building forms that enhance safety and walkability.

Alternative 5 would be developed with a floor area of 4.5:1 and incorporate retail and restaurant floor area, as under the Project. Approximately 17,485 square feet of retail and restaurant uses would be provided on the East Site, and approximately 12,691 square feet of retail and restaurant uses would be provided on the West Site, for a total of 30,176 square feet of retail and restaurant uses. Alternative 5 would provide both market-rate and senior affordable housing, as under the Project, but at a reduced rate compared to the Project to reflect an incremental reduction in floor area. Alternative 5 would provide 303 market-rate units and 46 senior affordable units on the East Site; and 280 market-rate units and 43 senior affordable units on the West Site, for a total of 583 market-rate units and 89 senior affordable units. Alternative 5's residential components would be provided within four buildings, two each on the East and West Sites. The East Building would reach a height of 375 feet at the top of the 29th story and 425 feet at the top of the bulkhead. The West Building would reach a height of 264 feet at the top of the 20th story and 304 feet at the top of the bulkhead. The East Senior Building, located along Argyle Avenue, would be seven stories and reach a maximum height of 101.5 feet at the top of the 7th story and 113 feet at the top of the bulkhead. The West Senior Building, which would be located in the northwestern corner of the Project Site would reach a height of 106 feet at the top of the 7th story and 126 feet at, the top of the bulkhead. Alternative 5 would be developed with a total of 36,551

square feet of publicly accessible open space at the ground level, which would form a paseo through the East Site and a plaza accessible from Vine Street on the West Site. No performance stage would be located within the paseo off of Vine Street on the East Site. The total new floor area for Alternative 5 would be approximately 789,921 square feet, which would represent an approximate 38.7-percent reduction in floor area compared to the Project. A four-level subterranean parking structure containing 438 spaces would be provided on the East Site; and a three-level subterranean parking structure containing 308 parking spaces would be provided on the West Site, for a total of 746 parking spaces. Vehicle and bicycle parking would be provided in accordance with LAMC requirements.

f) Alternative 6: Above-Grade Parking Alternative

The Above-Grade Parking Alternative (Alternative 6) would replace the Project's subterranean parking with parking podiums that would provide parking, similar to the Project, in excess of Code-required parking. Alternative 6 would provide 480 parking spaces on the East Site in an 11-level, parking podium and 1,041 parking spaces in a five-level, parking podium on the West Site, for a total of 1,521 parking spaces. The parking podiums would accommodate parking for all on-site uses. This Alternative would exceed the LAMC parking requirements of 1,513 spaces by eight (8) spaces. Bicycle parking would be provided in accordance with LAMC requirements.

Consistent with the Project, Alternative 6 would provide the same amount of retail/restaurant square footage (30,176 square feet) and the same total number of residential units (1,005 units), including the same number of market-rate (872) and senior affordable units (133). Also consistent with the Project, Alternative 6 would include 423 market-rate units and 65 senior affordable units on the East Site; and 449 market-rate units and 68 senior affordable units on the West Site. Alternative 6, however, would have a total floor area of 1,286,634 square feet and a 6.972:1 FAR, or 516 square feet less than the Project and just below the Project's 6.973:1 FAR.[6]

Residential components of Alternative 6 would be provided within four buildings, two each on the East and West Sites, with retail and restaurant uses incorporated into the ground level, similar to the Project. The 46-story East Building would reach a height of 545 feet at the top of the 46th story and 595 feet at the top of the bulkhead. The East Senior Building would be located above the East Site parking podium. The East Senior Building would reach a height of 240 feet at the top of the 21st story and 260 feet at the top of the bulkhead. The ground floor of the 11-level parking podium beneath the East Senior Building would include parking and a lobby for the East Senior Building. Levels 2-11 would be parking only, and Levels 12-21 would include the senior affordable units. The parking podium would extend

[6] The minor difference in total floor area between the Project and Alternative 6 is due to the differences in design.

to and connect with the East Site Building, providing parking on Levels 2-11 beneath the amenity deck. The amenity deck would be located on 12th level of the East Site parking podium and would be available to Project residents. The amenity deck would include similar recreational and open space features as the Project.

The 35-story West Building would reach a height of 429 feet at the top of the 35th story and 469 feet at the top of the bulkhead.[7] The West Senior Building would be located above the West Site parking podium. The West Senior Building would reach a height of 179 feet at the top of the 15th story and 198.5 feet at the top of the bulkhead. The ground floor of the five-level parking podium beneath the West Senior Building would include commercial space, parking and a lobby for the West Senior Building. Levels 2-5 beneath the West Senior Building would be parking only, and Levels 6-15 would include the senior affordable units. The parking podium would extend to and connect with the West Building, providing parking on Levels 1-4 beneath the amenity deck. The amenity deck would be located on the 5th level of the West Site parking podium and would be available to Project residents. The amenity deck would include similar recreational and open space features as the Project.

While the proposed mix of uses would remain the same as the Project, the configuration of the ground floor commercial uses and residential lobbies for the Senior Buildings would be reconfigured in order to accommodate the parking podiums. The four commercial spaces would be located on the ground floor along: Vine Street in the East Building; Vine Street in the West Building; and Yucca Street and Ivar Avenue in the West Senior Building.

Alternative 6 would be developed with a total of 24,541 square feet of publicly accessible open space at the ground level, as compared to 33,922 square feet of publicly accessible open space under the Project. A paseo extending between Vine Street and Ivar Avenue would be provided on the West Site; however, because of the parking podium on the East Site, the paseo would not extend to Argyle Avenue. As such, the open space plaza on the East Site would only be accessible from Vine Street. In addition, no performance stage would be located within the paseo off of Vine Street on the East Site as the East Building footprint would preclude this Project feature from occurring.

g) Alternative 7: Primarily Office Alternative

The Primarily Office Alternative (Alternative 7) would consist of only commercial uses. Alternative 7 would incorporate retail and restaurant floor area as under the Project. Approximately 17,485 square feet of retail and restaurant uses would be provided on the East Site, and approximately 14,083 square feet of retail and restaurant uses would be provided on the West Site, for a total of 31,568 square

[7] The minor difference in height between the Project's West Site Building and Alternative 6's West Site Building is due to the differences in design.

feet of retail and restaurant uses. Alternative 7 would also include the development of 537,280 square feet of office uses on the East Site (East Office Building) and 525,872 square feet of office uses on the West Site (West Office Building), for a total of 1,063,152 square feet of office floor area. Unlike the Project, Alternative 7 would not provide for the development of any residential uses.

The retail and office components of this Alternative would be provided in two buildings, one each on the East Site and the West Site. The East Office Building would be 29 stories and reach a height of 456 feet at the top of the 29th story and 506 feet at the top of the bulkhead. The West Office Building would be 27 stories and reach a height of 429 feet at the top of the 27th story and 469 feet at the top of the bulkhead. Alternative 7 would be developed with a total of 24,900 square feet of publicly accessible open space at the ground level. A paseo extending between Vine Street and Ivar Avenue would be provided on the West Site; however, because of a proposed parking structure along Argyle Avenue, the open space plaza on the East Site would only be accessible from Vine Street. The total new floor area for Alternative 7 would be approximately 1,094,720 square feet, which would result in an FAR of 6.017:1. A three-level subterranean parking structure and four-level parking podium, collectively containing 1,645 spaces, would be provided on the East Site, and a four-level subterranean parking structure and five-level parking podium, collectively containing 1,100 parking spaces, would be provided on the West Site, for a total of 2,745 parking spaces. Vehicle and bicycle parking would be provided in accordance with LAMC requirements.

h) Alternative 8: Office, Residential and Commercial Alternative

The Office, Residential and Commercial Alternative (Alternative 8) would provide a mix of office, residential and commercial uses, with a total of 386,347 square feet of office uses and 27,140 square feet of commercial (i.e., restaurant and retail) uses distributed between the West and East Sites; and a total of 770 market-rate residential units and 133 senior affordable units, for a total of 903 residential units. Alternative 8 would include approximately 33,105 square feet of publicly accessible open space at the ground level, which includes a paseo through the East and West Sites, connecting Argyle Avenue to Ivar Avenue. The commercial uses would be distributed between the East and West Sites, with a commercial space located at the ground floor on the corner of Yucca Street and Ivar Avenue and along Vine Street in the West Site, and along Argyle Avenue in the East Site.

The West Site would be developed with two residential structures. The West Building, along Vine Street, would be 48 stories and reach a height of 545 feet at the top of the 48th story and 595 feet at the top of the bulkhead. The West Senior Building, at the southeast corner of Yucca Street and Ivar Avenue, would be 13 stories and reach a height of 169 feet at the top of the 13th story and 209 feet at the top of the bulkhead. The East Site would be developed with the East Office

Building containing 386,347 square feet of office uses. The building would be 17 stories and reach a height of 317 feet at the top of the 17th story and 367 feet at the top of the bulkhead.

Under Alternative 8, a four-level subterranean parking structure containing a total of 1,134 spaces would be provided on the West Site; and a four-level subterranean parking structure containing 1,103 parking spaces would be provided on the East Site, for a total of 2,237 parking spaces. The total new floor area for Alternative 8 would be 1,287,100 square feet, with an FAR of 6.973:1, the same as under the Project, although the total overall floor area for Alternative 8 would be 50 square feet less than the Project.

Under Alternative 8, the proposed residential buildings on the West Site would incorporate LEED Gold Certification, as with the Project, and the proposed office building would combine LEED Platinum (the highest level of LEED Certification) and WELL Gold Certification.[8] Example LEED Platinum sustainability features include the following:

- 40-percent reduction in water consumption
- Low-flow bathroom fixtures
- Storm water collection and reuse
- Improved daylighting on office floors to maximize the reach of natural light into the floor plates
- Energy optimization through high-performance design
- Enhanced commissioning to ensure building systems are achieving their desired efficiency
- Self-sustaining green vegetative roofs to decrease storm water runoff, reduce heat island effect and increase biodiversity
- Use of regional materials to reduce the need to transport building materials
- Recycling room and building-wide trash and recycling
- Bicycle program, including bicycle storage, bicycle repair and valet, bicycle share
- Use of recycled content, material reuse, and low-emitting materials
- Green power purchasing program
- On-site transit information

[8] The WELL Building Standard is a performance-based system for measuring, certifying, and monitoring features of the built environment that impact human health and wellbeing, through air, water, nourishment, light, fitness, comfort, and mind.

- Enhanced refrigerant management to offset global warming potential
- Implementation of green cleaning throughout the Project
- ParkSmart certified parking garage, with electric charging stations, car share, ride share, and green cleaning[9]

Although the listed items are the same as under the LEED Gold Certification (see Section O, *Energy Conservation and Infrastructure*, of the Draft EIR), LEED Platinum requires more points of compliance with options offered under the LEED Certification program and, therefore, is held to a higher conservation standard than under LEED Gold. The WELL Gold Certification program for Alternative 8 focuses on features that contribute to the health and well-being of occupants and visitors. The combination of the LEED Platinum and WELL Gold Certifications would create a building with exceptional sustainability benefits. Example WELL Gold Certification features include:

- Enhanced ventilation in all floors, with 30 percent more fresh air than comparable buildings
- Fresh air systems, with advanced air filtration with 95-percent efficiency
- Rigorous air and water quality testing providing high quality fresh air and high quality water
- Office common amenities will provide healthy food and beverage options
- State-of-the-art fitness center that includes fitness equipment and programming
- Showering facilities for those that bike to work and/or use the fitness center

i) Environmentally Superior Alternative

As the alternatives analyses relative to the Project and the Project with the East Site Hotel Option would be mostly similar, except as noted in the applicable analyses in Chapter V, *Alternatives*, of the Draft EIR, the below discussion applies to both the Project and the Project with the East Site Hotel Option.

Section 15126.6(e)(2) of the State CEQA Guidelines indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR and that if the "no project" alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives.

Selection of an environmentally superior alternative is based on comparison of the alternatives to determine which among the alternatives would reduce or eliminate

[9] Parksmart is a certification program that defines, measures and recognizes high-performing, sustainable garages.

the impacts associated with the Project to the greatest degree. The comparative impacts of the Project and the Project Alternatives are summarized in Table V-15, *Comparison of Impacts Associated with the Alternatives and the Project*, in Chapter V of this Draft EIR. The comparisons apply to the Project and the Project with the East Site Hotel unless, noted otherwise.

Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project/No Build Alternative, would be considered the environmentally superior because it would not involve new development and assumes on-site uses would continue to operate similar to existing conditions. Although Alternative 1 would not meet any of the Project Objectives, it would avoid all of the Project's significant impacts, including the Project's significant and unavoidable construction noise and vibration impacts and associated significant unavoidable vibration impacts to historical resources. However, because the No Project/No Build alternative has been identified as the environmentally superior alternative, identification of another environmentally superior alternative is required.by the CEQA Guidelines.

Alternative 2, the Development under Existing Zoning Alternative, and Alternative 5, the Proposed Community Plan Update-Compliant Alternative, would reduce the most Project impacts, the majority of which are less-than-significant impacts. Overall, Alternative 2 would reduce several more impact areas compared to Alternative 5. As these Alternatives would consist of a lower scale of development with respect to total floor area and residential units compared to the Project, they would particularly reduce the Project's less-than-significant impacts related to public services and utilities where the magnitude of impacts are associated with population increases.

As Alternatives 2 and 5 would require site clearance, excavation, and foundation development as with all the proposed build alternatives, Alternatives 2 and 5 would exceed threshold standards for noise and vibration. Accordingly, temporary noise and vibration impacts during certain phases of construction under the Project and all the build alternatives cannot be mitigated to less-than-significant levels because of the proximity of off-site noise and vibration sensitive uses. However, because of their smaller size, construction-related impacts would be of shorter duration.

Alternative 3, the Reduced Maximum Height Alternative, would also reduce many of the Project's less-than-significant impacts but without as many reductions in impacts as Alternatives 2 and 5. Alternative 3 would also result in greater impacts than the Project with the East Site Hotel Option with respect to Parks/Recreation and Library Facilities.

Alternative 6, the Above-Grade Parking Alternative, would also reduce many of the Project's impacts associated with the proposed excavation, while increasing effects related to Aesthetics (scenic vistas) and impacts with respect to

Transportation (conflicts with programs, plans, ordinances or policies addressing the circulation system and alternative transportation facilities).

Alternatives 4 and 7 would both result in greater impacts associated with: Air Quality (consistency with plans, cumulative increases in criteria pollutants-operation, and carbon monoxide hotspots); GHG (emissions and plan consistency); Hazards (emergency responses plans); Population and Housing; Public Services (Fire Protection and Schools); and Utilities (Solid Waste). Alternative 4 would also have greater impacts regarding Transportation (Vehicle Miles Traveled or "VMT"). Alternative 7's additional greater impacts include Aesthetics (scenic vistas) and Transportation (conflicts with programs, plans, ordinances or policies addressing the circulation system and alternative transportation facilities).

Alternative 8 would reduce some of the Project impacts but would also cause impacts to be greater than the Project with the respect to Air Quality (criteria pollutants-operation, localized emissions, and carbon monoxide hotspots); GHG (emissions); Hazards (emergency responses plans); Public Services (Fire Protection, Police Protection, and Schools); and Utilities (Solid Waste). Also, under Alternative 8, impacts regarding Public Services (Parks/Recreation and Library Facilities) would be greater than the Project with the East Site Hotel Option.

In conclusion, because Alternative 2 would result in the most reduction of impacts compared to the Project, it is considered to be the Environmentally Superior Alternative.

Also, with regard to the Alternatives ability to meet the Project Objectives, Alternatives 2 through Alternative 7, because of either their mix of uses, scale of development, above-grade parking structures, or other factors, only partially meet some of the Project Objectives (i.e., to a lesser extent than the Project). Additionally, by not including any senior affordable units, Alternatives 2, 4, and 7 would not meet Project Objective No. 6. Conversely, the design, mix of uses, and density of Alternative 8 would meet all Project Objectives.

7. Summary of Environmental Impacts

This section provides a summary of impacts, Project Design Features, mitigation measures, and level of significance after implementation of mitigation measures associated with Project. The summary is provided by environmental issue area below in **Table ES-1**, *Summary of Project Impacts, Project Design Features, and Mitigation Measures*.

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
Draft EIR			
IV.A Aesthetics[10]			
Threshold (a): Would the Project have a have a substantial adverse effect on a scenic vista?	**AES-PDF-1: Construction Fencing.** Temporary construction fencing will be placed along the periphery of the Project Site to screen construction activity for new buildings from view at the street level. A minimum eight-foot-high construction fence will be located along the perimeter of the active construction sites. Protective fencing or walls will be incorporated between and the south wall of the Capitol Records Building during demolition, excavation, and new building erection on the East Site. The Project Applicant will ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public and that such temporary barriers and walkways are maintained in a visually attractive manner (i.e., free of trash, graffiti, peeling postings and of uniform paint color or graphic treatment) throughout the construction period.	No mitigation measures are required.	No Impact

[10] SB 743 and ZI No. 2452 provide that a mixed-use project in a designated TPA site is not required to evaluate aesthetic impacts in an EIR pursuant to CEQA. Therefore, pursuant to SB 743, the Project's aesthetics impacts would not be considered significant.

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
Threshold (b): Would the Project substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a City-designated scenic highway?	None	No mitigation measures are required.	No Impact
Threshold (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?	**AES-PDF-2: Screening of Utilities.** Mechanical, electrical, and roof top equipment (including Heating, Ventilation, and Air Conditioning [HVAC] systems), as well as building appurtenances, will be integrated into the Project's architectural design (e.g., placed behind parapet walls) and be screened from view from public rights-of-way.	No mitigation measures are required.	Less Than Significant Impact

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
Threshold (d): Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	**AES-PDF-1** (see above) **AES-PDF-3: Glare.** Glass used in building façades will be anti-reflective or treated with an anti-reflective coating in order to minimize glare (e.g., minimize the use of glass with mirror coatings). **AES-PDF-4: Lighting.** Construction and operational lighting will be shielded and directed downward (or on the specific on-site feature to be lit) in such a manner so as to avoid undue glare or light trespass onto adjacent uses.	No mitigation measures are required.	No Impact
IV.B Air Quality			
Threshold (a): Would the Project conflict with or obstruct implementation of the applicable air quality plan?	None	No mitigation measures are required.	Less than Significant
Threshold (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?	**GHG-PDF-1** (see below)	**AQ-MM-1: Construction Equipment Features.** The Applicant shall implement the following construction equipment features for equipment operating at the Project Site. These features shall be included in applicable bid documents, and successful contractor(s) must demonstrate the ability to supply such equipment. Construction features shall include the following: • The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental	Less than Significant with Mitigation for both Construction and Operation

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
		Protection Agency (USEPA) Tier 4 Final off-road emissions standards or equivalent for equipment rated at 50 horsepower (hp) or greater during Project construction where available within the Los Angeles region. Such equipment shall be outfitted with Best Available Control Technology (BACT), which means a CARB-certified Level 3 DPM or equivalent. • Construction equipment, such as tower cranes, shall utilize electricity from power poles or alternative fuels (i.e., non-diesel) rather than diesel power generators and/or gasoline power generators. Pole power shall be made available for use for electric tools, equipment, lighting, etc. If stationary construction equipment, such as diesel- or gasoline-powered generators, must be operated continuously, such equipment shall be located at least 100 feet from sensitive land uses (e.g., residences, schools, childcare centers, hospitals, parks, or similar uses), whenever possible. • Contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. All construction equipment must be properly tuned and maintained in accordance with the manufacturer's specifications. The contractor shall keep documentation on-site	

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
		demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications. Tampering with construction equipment to increase horsepower or to defeat emission control devices shall be prohibited. **AQ-MM-2: Emergency Generators.** The Project representative shall schedule routine maintenance and testing of the emergency generators installed on the Project Site on different days. Prior to the installation of emergency generators, the Project representative shall supply documentation to the City that emergency generator testing by contractors, service providers, or maintenance crews shall be conducted in accordance with the specified requirements. The Project representative shall maintain records of emergency generator testing, including testing dates, which shall be made available to the City upon request.	

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
Threshold (c): Would the Project expose sensitive receptors to substantial pollutant concentrations?	None	**AQ-MM-1** (see above)	Less than Significant for: • Localized Construction Emissions • Localized Operational Emissions • Carbon Monoxide Hotspots • Toxic Air Contaminant Emissions during Operation Less than Significant with Mitigation for: • Toxic Air Contaminant Emissions during Construction
Threshold (d): Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	None	No mitigation measures are required.	Less than Significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
IV.C Cultural Resources			
Threshold (a): Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	None	**NOI-MM-4** (see below) **CUL-MM-1:** Prior to any disturbance to the Hollywood Walk of Fame, a City of Los Angeles designated Historic-Cultural Monument, the Applicant shall contact the Hollywood Chamber of Commerce/Hollywood Historic Trust (Chamber/Trust) directly via letter detailing the location of the Project Site, its potential impact on the Hollywood Walk of Fame, Project timeframe, list of affected stars and surrounding sidewalk area, proposed procedures for removal of stars, where and for how long the stars would be stored, how they would be secured, and other relevant details. The Chamber/Trust would reply via letter with the required procedures related to alterations to the Hollywood Walk of Fame and a list of contractors approved for such work. Additionally, the Chamber/Trust would request a formal in-person meeting between the Applicant, Chamber/Trust officials, and staff from the Office of Historic Resources and Department of Public Works Bureau of Engineering to discuss the process in greater depth. Written correspondence to the Chamber/Trust shall be sent to the address that follows: Hollywood Chamber of Commerce, 6255 Sunset Boulevard, Suite 150, Hollywood, CA 90028. Accepting that specific details for removal,	Direct Impacts: • Capitol Records Building – Less than Significant • Gogerty Building – No Impact • Hollywood Walk of Fame – Less than Significant with Mitigation • Pantages Theatre – No Impact • Avalon Hollywood – No Impact • Art Deco Building – No Impact Indirect Impacts: • Capitol Records Building – Less than Significant with Mitigation • Gogerty Building – Less than Significant with Mitigation • Hollywood Walk of Fame – Less than Significant with Mitigation

		storage and, replacement of affected stars and terrazzo shall be determined through coordination with the Chamber/Trust, the following general procedures shall be implemented: • Photographic and documentary recordation of the location of each Hollywood Walk of Fame star potentially impacted by project construction shall be completed by a qualified architectural historian meeting the Secretary of the Interior's Professional Qualification Standards for Architectural History; • Prior to any construction or demolition activities that have the potential to damage the sidewalk along Vine Street, each section of sidewalk containing a star that cannot be reasonably protected in place shall be cut and carefully removed [by a qualified restoration contractor] within its respective bronze-bordered square as specifically directed by Chamber/Trust procedures. Each affected star shall be promptly crated and stored, at a secured off-site location; • Following completion of Project construction, reinstallation of each affected star at its original documented location shall occur within a newly poured, color-matched terrazzo sidewalk [by a qualified restoration contractor] with work completed to the satisfaction of the Chamber/Trust, the Office of Historic Resources, and the Department of Public Works Bureau of Engineering; and	• Pantages Theatre – Significant and Unavoidable • Avalon Hollywood – Significant and Unavoidable • Art Deco Building – Significant and Unavoidable

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
		• Excavation and construction activities in the vicinity of the Hollywood Walk of Fame and work conducted by the restoration contractor to remove, store, and replace affected areas of the Hollywood Walk of Fame, shall be monitored by a qualified historic preservation consultant meeting the Secretary of the Interior's Professional Qualification Standards for Architectural History and documented in a monitoring report that shall be provided to the City of Los Angeles, Office of Historic Resources, and the Chamber/Trust. **CUL-MM-2:** Excavation and shoring have the potential to damage buildings in close proximity to the Project Site; therefore, the following procedures are required for shoring system design and monitoring of excavation, grading, and shoring activities are proposed: • Excavation and shoring plans and calculations for temporary shoring walls shall be prepared by a California Registered Civil Engineer experienced in the design and construction of shoring systems and hired under the excavation subcontractor. The shoring systems shall be selected and designed in accordance with all current code requirements, industry best practices, and the recommendations of the Project	

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
		Geotechnical Engineer. Maximum allowable lateral deflections for the Project Site are to be developed by the Project Geotechnical Engineer in consideration of adjacent structures, property, and public rights-of-way. These deflection limits shall be prepared in consideration of protecting adjacent historic resources. The shoring engineer shall produce a shoring design, incorporating tie-backs, soldier piles, walers, etc., that is of sufficient capacity and stiffness to meet or exceed the Project strength and deflection requirements. Calculations shall be prepared by the shoring engineer showing the anticipated lateral deflection of the shoring system and its components and demonstrating that these deflections are within the allowable limits. Where tie-back anchors shall extend across property lines or encroach into the public rights-of-way, appropriate notification and approval procedures shall be followed. The final excavation and shoring plans shall include all appropriate details, material specifications, testing and special inspection requirements and shall be reviewed by the Project Geotechnical Engineer for conformance with the design intent and submitted to LADBS for review and approval during the Grading	

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
		Permit application submission. The Project Geotechnical Engineer shall provide on-site observation during the excavation and shoring work. • The general contractor shall hire a California Registered Professional Engineer or California Professional Land Surveyor to prepare an Adjacent Structures Construction Monitoring Plan, subject to review and approval by LADBS, prior to initiation of any excavation, grading, or shoring activities to ensure the protection of adjacent historic resources from damage due to settlement during construction and excavation. The Adjacent Structures Construction Monitoring Plan shall be carried out by a California Professional Land Surveyor and establish survey monuments and document and record through any necessary means, including video, photography, survey, etc. the initial positions of adjacent structures, sidewalks, buildings, utilities, facades, cracks, etc. to form a baseline for determining settlement or deformation. Upon installation of soldier piles, survey monuments shall be affixed to the tops of representative piles so that deflection can be measured. The shored excavation and adjacent structures, sidewalks, buildings, utilities, facades, cracks, etc. shall be visually inspected each	

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
		day. Survey monuments shall be measured at critical stages of dewatering, excavation, shoring, and construction but shall not occur less frequently than once every 30 days. Reports shall be prepared by the California Professional Land Surveyor documenting the movement monitoring results. • Appropriate parties shall be notified immediately and corrective steps shall be identified and implemented if movement exceeds predetermined thresholds, calculated amounts, or if new cracks or distress are observed in adjacent structures, sidewalks, buildings, utilities, façades, etc. In the event that settlement due to excavation or construction activity causes damage requiring touch-ups or repairs to the finishes of adjacent historic buildings, (specifically the Capitol Records Building, the Gogerty Building, Pantages Theatre, Avalon Hollywood, and 6316-24 Yucca Street/Art Deco Building storefront), that work shall be performed in consultation with a qualified preservation consultant and in accordance with the California Historical Building Code and the Secretary of the Interiors' Standards, as appropriate.	

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
		• Foundation systems are to be designed in accordance with all applicable loading requirements, including seismic, wind, settlement, and hydrostatic loads, as determined by the California Building Code and in accordance with the recommendations provided by the Project Geotechnical Engineer. Foundation systems are anticipated to consist of a cast-in-place concrete mat foundations supported by cast-in-place concrete drilled shaft or auger cast piles. Driven piles shall not be used.	
Threshold (b): Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	None	**CUL-MM-3:** Prior to issuance of a grading permit and prior to the start of any ground-disturbing activity, the Applicant shall retain a qualified archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during construction excavations, such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project, including peripheral activities, such as sidewalk replacement, utilities work, and landscaping, which may occur adjacent to the Project Site. The frequency of monitoring shall be based on the rate of excavation and grading activities, the materials being excavated (younger	Less than Significant with Mitigation

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
		sediments vs. older sediments), the depth of excavation, and, if found, the abundance and type of archaeological resources encountered. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined adequate by the Qualified Archaeologist. Prior to commencement of excavation activities, Archaeological Sensitivity Training shall be given for construction personnel. The training session shall be carried out by the Qualified Archaeologist and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event. **CUL-MM-4:** In the event that historic (e.g., bottles, foundations, refuse dumps/privies, railroads, etc.) or prehistoric (e.g., hearths, burials, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A 50-foot buffer within which construction activities shall not be allowed to continue shall be established by the Qualified Archaeologist around the find. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by Project construction activities shall be evaluated by the Qualified Archaeologist. If a resource is	

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
		determined by the Qualified Archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the Applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If, in coordination with the City, it is determined that preservation in place is not feasible, appropriate treatment of the resource shall be developed by the Qualified Archaeologist in coordination with the City and may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school, Tribe, or	

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
		historical society in the area for educational purposes. **CUL-MM-5:** Prior to the release of the grading bond, the Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register and CEQA. The report and the Site Forms shall be submitted by the Applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the development and required mitigation measures.	
Threshold (c): Would the Project disturb any human remains including those interred outside of dedicated cemeteries?	None	No mitigation measures are required.	Less than Significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
IV.D Geology and Soils			
Threshold (a): Would the Project directly or indirectly cause potential substantial adverse effects, including the risk or 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. Seismically-related ground failure, including liquefaction? iv. Landslides?	None	No mitigation measures are required.	i. Less than Significant ii. Less than Significant iii. Less than Significant iv. No Impact
Threshold (b): Would the Project result in substantial soil erosion or the loss of topsoil?	None	No mitigation measures are required.	Less than Significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
Threshold (c): Would the Project be located on a geologic unit or soil that is unstable or that would become unstable as a result of the Project, and potentially result in on-site or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	None	No mitigation measures are required.	Less than Significant
Threshold (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 risk to life or property?	None	No mitigation measures are required.	Less than Significant Construction Impacts No Operational Impacts
Threshold (e): Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of wastewater?	None	No mitigation measures are required.	No Impact

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
Threshold (f): Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	None	**GEO-MM-1:** A Qualified Paleontologist meeting the SVP Standards (Qualified Paleontologist) shall be retained prior to the approval of demolition or grading permits. The Qualified Paleontologist shall provide technical and compliance oversight of all work as it relates to paleontological resources, shall attend the Project kick-off meeting and Project progress meetings on a regular basis, and shall report to the Project Site in the event potential paleontological resources are encountered. **GEO-MM-2:** The Qualified Paleontologist shall conduct construction worker paleontological resources sensitivity training at the Project kick-off meeting prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.). In the event construction crews are phased, additional training shall be conducted for new construction personnel. The training session shall focus on the recognition of the types of paleontological resources that could be encountered within the Project Site and the procedures to be followed if they are found. Documentation shall be retained by the Qualified Paleontologist demonstrating that the appropriate construction personnel attended the training. **GEO-MM-3:** Paleontological resources monitoring shall be performed by a qualified paleontological monitor (meeting the standards of the SVP, 2010) under the	Less than Significant with Mitigation for Construction No Impact for Operation

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
		direction of the Qualified Paleontologist. Paleontological resources monitoring shall be conducted for all ground disturbing activities in previously undisturbed sediments which have high sensitivity for encountering paleontological resources. Depending on the conditions encountered, full-time monitoring can be reduced to part-time inspections or ceased entirely if determined adequate by the Qualified Paleontologist. The Qualified Paleontologist shall spot check the excavation on an intermittent basis and recommend whether the depth of required monitoring needs to be revised based on his/her observations. Monitors shall have the authority to temporarily halt or divert work away from exposed fossils or potential fossils. Monitors shall prepare daily logs detailing the types of activities and soils observed and any discoveries. Any significant fossils collected during Project-related excavations shall be prepared to the point of identification and curated into an accredited repository with retrievable storage. The Qualified Paleontologist shall prepare a final monitoring and mitigation report for submittal to the City in order to document the results of the monitoring effort and any discoveries. If there are significant discoveries, fossil locality information and final disposition shall be included with the final report, which shall be submitted to the appropriate repository and the City.	

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
IV.E Greenhouse Gas Emissions			
Threshold (a): Would the Project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?	**WS-PDF-1** (see below) **GHG-PDF-1: Green Building Features.** The Project will achieve the USGBC LEED Gold Certification and will be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code and the City of Los Angeles Green Building Code. A summary of key green building and LEED measures are provided below: • The Project will incorporate heat island reduction strategies for 50 percent of the Project Site hardscapes or provide 100 percent structured parking and incorporate heat island reduction strategies for the Project roof areas. • The Project will promote alternatives to conventionally fueled automobiles by designating a minimum of 8 percent of on-site non-residential parking for carpool and/or alternative-fueled vehicles and shall pre-wire, or install conduit and panel capacity for a minimum of 30 percent of the Code-required parking spaces, with 10 percent of the Code-required spaces further improved with electric vehicle charging stations. • The Project will optimize building energy performance with a 20 percent reduction from the LEED Version 4 (v4) baseline consistent with LEED	No mitigation measures are required.	Less than Significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
	requirements (equivalent to approximately 11.6 percent reduction from the 2016 Title 24 standards). • The Project will reduce water consumption by 40 percent for indoor water and 100 percent for outdoor water from the LEED v4 usage baseline. The reductions would be achieved through potential strategies such as the installation of water efficient fixtures that exceed applicable standards and water efficient landscaping.		
Threshold (b): Would the Project conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?	**WS-PDF-1** (see below) **GHG-PDF-1** (see above)	No mitigation measures are required.	Less than Significant
IV.F Hazards and Hazardous Materials			
Threshold (a): Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	None	No mitigation measures are required.	Less than Significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
Threshold (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?	None	**HAZ-MM-1: Soil Management Plan.** The Project Applicant shall retain a qualified environmental consultant to prepare a Soils Management Plan (SMP), which shall be submitted to the Los Angeles Department of Building and Safety (LADBS) for review and approval prior to the commencement of excavation and grading activities. The SMP shall establish policy and requirements for the management and disposal of soils, as well as for any steel structures, including USTs, should they be encountered, during soil-disturbing activities performed at the Project Site (i.e., excavation, grading, trenching, utility installation or repair, and other human activities) that may disturb potentially contaminated soils. The SMP shall describe specific soil- and UST-handling controls required to comply with federal, state, and local, overseeing agencies; prevent unacceptable exposure to contaminated soils or vapors during construction; and prevent the improper disposal of contaminated soils or steel structures.	Less than Significant with Mitigation
Threshold (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?	None	**HAZ-MM-1** (see above)	Less than Significant with Mitigation

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
Threshold (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 it create a significant hazard to the public or the environment?	None	No mitigation measures are required.	No Impact
Threshold (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?	None	No mitigation measures are required.	No Impact
Threshold (f): Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	**TRAF-PDF-2** (see below)	No mitigation measures are required.	Less than Significant
Threshold (g): Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	None	No mitigation measures are required.	No Impact

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
IV.G Hydrology And Water Quality			
Threshold (a): Would the Project violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or ground water quality?	None	No mitigation measures are required.	Less than Significant
Threshold (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?	None	No mitigation measures are required.	Less than Significant
Threshold (c): Would the Project substantially alter the existing drainage pattern of the site or area, including through 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	None	No mitigation measures are required.	i. Less than Significant ii. Less than Significant iii. Less than Significant iv. No Impact

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
would result in flooding on- or offsite? iii. Create or contribute runoff water which would exceed the capacity of the existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? iv. Impede or redirect flood flows?			
Threshold (d): Would the Project, if in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	None	No mitigation measures are required.	Less than Significant
Threshold (e): Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	None	No mitigation measures are required.	Less than Significant
IV.H Land Use and Planning			
Threshold (a): Would the Project physically divide an established community?	None	No mitigation measures are required.	Less than Significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
Threshold (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?	None	No mitigation measures are required.	Less than Significant
IV.I Noise			
Threshold (a): Would the Project result in the 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?	**TRAF-PDF-2** (see below) **NOI-PDF-1: Impact Pile Driving and Blasting Prohibitions.** The Project will not use or allow impact pile drivers and will not require or allow blasting during construction activities. **NOI-PDF-2: Construction Power Sources.** Electricity from power poles, where power poles are available, and/or solar-powered generators rather than temporary diesel or gasoline generators will be used during construction. If diesel- or gasoline-powered generators are used, such equipment will be located at least 100 feet away from off-site sensitive land uses (e.g., residences, schools, childcare centers, hospitals, parks, or similar uses), whenever possible, and flexible sound control curtains will be placed around the equipment when in use. **NOI-PDF-3: Outdoor Performance Sound Restrictions.** The Project will not require or allow operation of an amplified sound system in the outdoor plaza areas	**NOI-MM-1**: Noise and vibration construction equipment whose specific location on the Project Site may be flexible (e.g., compressors and generators) shall be located away from the nearest off-site sensitive land uses (at least 100 feet away), or natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such equipment towards these land uses. **NOISE-MM-2:** The Project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices. In addition, no impact pile driving shall be utilized; augured, or drilled piles are permitted. Flexible sound control curtains shall be placed around all drilling apparatuses, drill rigs, and jackhammers when in use. **NOISE-MM-3:** A construction liaison shall be provided to inform the nearby receptors 1, 3, and 5 through 13 when peak noise and vibration activities are	On-Site Construction Noise: Significant and Unavoidable Off-Site Construction Noise: Significant and Unavoidable On-Site Operational Noise: Less than Significant Off-Site Traffic Noise: Less than Significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
	for performances, including the East Site Level 1 Performance Stage. Acoustic performances or ambient music speakers with prerecorded, low-level, background music on the East Site Level 1 Performance Stage will be limited to a sound level equivalent to 85 dBA measured at 25 feet from the performers. Compliance with this performance standard will be ensured through pre-performance noise tests/measurements for performances or ambient music speakers with potential to exceed the sound level, along with any necessary adjustments to the location and nature of proposed performances or ambient music speakers. Ambient music speakers for use on the Amenity Decks (Level 2) on both the East Site and the West Site will be downward or inward facing and used for background music only. **NOI-PDF-4: Emergency Generators.** Emergency generators will be designed to meet the requirements of LAMC Chapter XI, Section 112.02. Section 112.02 of the LAMC requires that any mechanical system within any zone of the City not cause an increase in ambient noise levels on any other occupied property or if a condominium, apartment house, duplex, or attached business, within any adjoining unit to exceed the ambient noise level by more than 5 dBA.	scheduled to occur. Two weeks prior to the commencement of construction at the Project Site, notification shall be provided to these receptor properties that discloses the construction schedule, including the various types of activities and equipment that would be occurring throughout the duration of the construction period.	

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
Threshold (b): Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?	**NOISE-PDF-1** (see above)	**NOISE-MM-4:** The Applicant shall perform structural vibration monitoring during Project construction as follows: a) Prior to start of construction, the Applicant shall retain the services of a licensed building inspector or structural engineer, or other qualified professional as approved by the City, to visit the following buildings, which are located adjacent to the Project Site and to the west, to inspect and document (video and/or photographic) the apparent physical condition of the building's readily-visible features. This includes both historic buildings and non-historic buildings in proximity to the Project Site. For the historic buildings listed below, inspection and documentation shall also be carried out by and in coordination with a qualified preservation consultant. The non-historic buildings are as follows: • AMDA Vine Building • Argyle House • Single-story commercial building at 1718 N. Vine Street (if this building has already been demolished as part of Related Project No. 2, the provisions of this mitigation measure do not apply to this structure) The historic buildings are as follows: • Capitol Records Building (on-site)	On-Site Vibration Impacts during Construction for Building Damage: • AMDA Vine Building – Significant and Unavoidable • Argyle House – Significant and Unavoidable • Capitol Records Building – Less than Significant with Mitigation • Gogerty Building – Less than Significant with Mitigation • Pantages Theatre – Significant and Unavoidable • Avalon Hollywood – Significant and Unavoidable • Art Deco Building - Significant and Unavoidable On-Site Vibration Impacts during Construction for Human Annoyance: Significant and Unavoidable

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
		• Gogerty Building (on-site) • Pantages Theatre (off-site) • Avalon Hollywood (off-site) • 6316-24 Yucca Street/Art Deco Building Storefront (off-site) b) The Applicant shall retain the services of a qualified acoustical engineer and/or structural engineer to develop and implement a vibration monitoring program during the site demolition and grading/excavation, capable of documenting the construction-related ground vibration levels at the buildings listed above. The vibration monitoring systems shall be placed at receptor building façades closest to Project construction activity or placed at a representative location if a receptor building façade is not accessible and shall continuously measure (in vertical and horizontal directions) and store the peak particle velocity (PPV) in inch/second. The systems shall also be programmed for two preset velocity levels: a warning level of 0.10 inch/second (PPV) for the off-site historic structures, 0.15 inch/second (PPV) for the single-story commercial building at 1718 N. Vine Street (not required if this building has already been demolished as part of Related Project No. 2), and 0.45 inch/second (PPV) for the Capitol Records Building, Gogerty Building, AMDA	Vibration Impacts during Operation: Less than Significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
		Vine Building and the Argyle House and a regulatory level of 0.12 inch/second (PPV) for the off-site historic structures, 0.2 inch/second (PPV) for the single-story commercial building at 1718 N. Vine Street (not required if this building has already been demolished as part of Related Project No. 2), and 0.50 inch/second (PPV) for the Capitol Records Building, Gogerty Building, AMDA Vine Building and the Argyle House. In cases where a receptor building façade is not accessible, the two preset velocity levels shall be programmed at equivalent levels based on distance and soil characteristics that affect vibration transmission over that distance. The systems shall also provide real-time alert when the vibration levels exceed the two preset levels. c) The vibration monitoring program shall be submitted, for review and approval to the Department of Building and Safety, prior to initiating any construction activities. d) In the event the warning level (i.e., 0.10, 0.15, and 0.45 inch/second [PPV], or equivalent levels) is triggered, the contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level, including but not	

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
		limited to staggering concurrent vibration-generating construction activities (if doing so would not pose a safety risk to personnel or damage risk to buildings or facilities) and utilizing lower vibratory techniques. e) In the event the regulatory level (i.e., 0.12, 0.20, and 0.50 inch/second [PPV], or equivalent levels) is triggered, the contractor shall identify the source of vibration generation and implement feasible steps identified in Item "d" above to reduce the vibration level from construction activities to avoid or minimize damage from construction activities in the vicinity of the building. The contractor shall visually inspect the building for any damage. Results of the inspection must be logged. f) In the event that the regulatory ground vibration levels are exceeded and there is documented evidence including a visual inspection that no damage to historic structures has occurred, the ground vibration levels can be increased to the criteria for the previous building structural category in increments as follows, subject to review and approval by the City, up to a maximum regulatory ground vibration level of 0.5 inch/second (PPV), or equivalent level.	

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SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
		• From Category IV to Category III (0.12 to 0.2 inch/second [PPV], or equivalent level), • From Category III to Category II (0.2 to 0.3 inch/second [PPV], or equivalent level), or • From Category II to Category I (0.3 to 0.5 inch/second [PPV], or equivalent level). If the regulatory ground vibration level is increased, the warning level shall also be increased matching the corresponding Category as follows (or equivalent levels): • Category I: 0.45 inch/second [PPV] • Category II: 0.25 inch/second [PPV] • Category III: 0.15 inch/second [PPV] • Category IV: 0.10 inch/second [PPV] g) If new regulatory and warning levels are set pursuant to Item "f" above, they can be exceeded and increased again pursuant to the same requirements in Item "f". h) In the event damage occurs to the historic buildings (finish materials) due to construction vibration, such materials shall be repaired in consultation with a qualified	

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
		preservation consultant, and, if warranted, in a manner that meets the Secretary of the Interior's Standards.	
Threshold (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?	None	No mitigation measures are required.	No Impact
IV.J Population and Housing			
Threshold (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)?	None	No mitigation measures are required.	Less than Significant
Threshold (b): Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	None	No mitigation measures are required.	No Impact

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
IV.K.1 Fire Protection			
Threshold (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?	**TRAF-PDF-2** (see below) **TRAF-PDF-3** (see below)	No mitigation measures are required.	Less than Significant
IV.K.2 Police Protection			
Threshold (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	**TRAF-PDF-2** (see below) **TRAF-PDF-3** (see below) **POL-PDF-1: Security Features During Construction.** Private security personnel will monitor vehicle and pedestrian access to the construction areas and patrol the Project Site, construction fencing with gated and locked entry will be installed around the perimeter of the construction site, and security lighting will be provided in and around the construction site. **POL-PDF-2: Security Features During Operation.** During operation, the Project will incorporate a 24-hour/seven-day security	No mitigation measures are required.	Less than Significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
objectives for police protection?	program to ensure the safety of its residents, employees, patrons, and site visitors. The Project's security will include, but not be limited to, the following design features: a. Installing and utilizing a 24-hour security camera network throughout the underground and above-ground parking garages, the elevators, the common and amenity spaces, the lobby areas, and the rooftop and ground level outdoor open spaces. All security camera footage will be maintained for at least 30 days, and such footage will be provided to the LAPD, as needed. b. Full-time security personnel. Duties of the security personnel will include, but would not be limited to, assisting residents and visitors with Project Site access, monitoring entrances and exits of buildings, and managing and monitoring fire/life/safety systems. c. Staff training and building access/design to assist in crime prevention efforts and to reduce the demand for police protection services. d. Controlled access to all housing units, hotel areas, and residential common open space areas through the use of key cards, site security and/or other means, as appropriate. e. Maintenance of unrestricted access to commercial/restaurant uses, publicly accessible open space areas, and the		

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
	paseo during business hours, with public access (except for authorized persons) prohibited after the businesses have closed via the use of gates, signage security patrols and/or other means determined appropriate. f. Lighting of entryways, publicly accessible areas, and common building and open space areas associated with the housing units and hotel rooms for security purposes. g. Regarding public events in the open space areas, following event completion and attendee dispersal, barricades to be placed on the stages, and regularly scheduled security patrols, as well as camera surveillance, to reduce the potential for undesirable activities within the publicly accessible open space.		
IV.K.3 Schools			
Threshold (a): Would the Project result in a substantial adverse physical impact associated with the provision of new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?	None	No mitigation measures are required.	Less than Significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
IV.K.4 Parks and Recreation			
Threshold (a): Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities (i.e., parks), 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 parks?	None	No mitigation measures are required.	Less than Significant
Threshold (b): 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?	None	No mitigation measures are required.	Less than Significant
Threshold (c): Would the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	None	No mitigation measures are required.	Less than Significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
IVK.5 Libraries			
Threshold (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 government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities (libraries)?	None	No mitigation measures are required.	Less than Significant
IV.L Transportation			
Threshold (a): Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	**TRAF-PDF-1: Transportation Demand Management (TDM) Program.** The Applicant will implement a TDM Program aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking. The TDM Program will be subject to review and approval by the Los Angeles Department of City Planning and LADOT. The exact measures to be implemented will be determined when the Program is prepared, prior to issuance of a final certificate of occupancy for the Project. The	No mitigation measures are required.	Less than Significant

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Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
	strategies in the TDM Program will include, but are not necessarily limited to: <u>Parking</u> • Unbundle residential parking and price according to market rate • Unbundle commercial parking coupled with pricing workplace parking and parking cash-out • Contribute to LADOT Express Park program to upgrade local parking meter technology • Daily parking discount for Metro Commuters <u>Transit</u> • Provide a location on-site at which to purchase Metro passes and display bus information • Transit subsidies (available to residents and commercial employees) up to 50 percent of the cost of a monthly pass • Provide parking spaces for monthly lease to non-resident Metro park-and-ride users • Provide discounted daily parking to non-resident Metro transit pass holders • Immediately adjacent Metro bus stop upgrades, which could include, but not limited to, street furniture, signage, and/or other transit-related information		

	Commute Trip Reductions
	• Commute trip reduction program:
	  ○ Rideshare (carpool/vanpool) matching and preferential parking
	  ○ Guaranteed ride home (e.g., monthly Uber/Lyft/taxi reimbursement)
	  ○ Encourage alternative work schedules and telecommuting for project residents
	• Business center/work center for residents working at home
	Shared Mobility
	• On-site car share
	• Rideshare matching
	• On-site bike share station with subsidized or free membership (residents, employees); on-site guest bike share service (hotel) (if/when public bike share comes to Hollywood)
	• Coordination with LADOT Mobility Hub program
	Bicycle Infrastructure
	• Develop a bicycle amenities plan
	• Bicycle parking (indoors and outdoors)
	• Bike lockers, showers, and repair station
	• Convenient access to on-site bicycle facilities (e.g., wayfinding, etc.)
	• Contribution towards City's Bicycle Plan Trust Fund
	Site Design
	• Integrated pedestrian network within and adjacent to site (e.g., transit-, bike-, pedestrian-friendly)		

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
	• External and internal multimodal wayfinding signage <u>Education & Encouragement</u> • Transportation information center, kiosks and/or other on-site measures, such as providing a Tenant Welcome Package (i.e., all new residents receive information on available alternative modes and ways to access destinations) • Tech-enabled mobility: incorporating commute planning, on-demand rideshare matching, shared-ride reservations, real-time traffic/transit information, push notifications about transportation choices, interactive transit screens, etc. • Marketing and promotions (including digital gamification – participants can log trips for prizes, promotions, discounts for local merchants, incentives, etc.) <u>Management</u> • On-site TDM Program coordinator and administrative support • Conduct user surveys • Join future Hollywood Transportation Management Organization (TMO)		

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
Threshold (b): Would the Project conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	**TRAF-PDF-1** (see above)	No mitigation measures are required.	Less than Significant
Threshold (c): Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?	None	No mitigation measures are required.	Less than Significant
Threshold (d): Would the Project result in inadequate emergency access?	**TRAF-PDF-2: Construction Traffic Management Plan.** Prior to the issuance of a building permit for the Project, a detailed Construction Management Plan (CMP), including street closure information, a detour plan, haul routes, and a staging plan, will be prepared and submitted to the City for review and approval. The CMP will formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The CMP will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site. Construction management meetings with City Staff and other surrounding construction-related project representatives (i.e., construction contractors), whose projects will potentially be under construction at around the same time as the Project, will be conducted bimonthly, or	No mitigation measures are required.	Less than Significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
	as otherwise determined appropriate by City Staff. This coordination will ensure construction activities of the concurrent related projects and associated hauling activities are managed in collaboration with one another and the Project. The CMP will include, but not be limited to, the following elements as appropriate: • As traffic lane, parking lane and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles, will be developed and implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures. • Ensure that access will remain unobstructed for land uses in proximity to the Project Site during project construction. • Coordinate with the City and emergency service providers to ensure adequate access, including emergency access, is maintained to the Project Site and neighboring businesses and residences. Emergency access points will be marked accordingly in consultation with LAFD, as necessary. • Provide off-site truck staging in a legal area furnished by the construction truck contractor. Anticipated truck access to the Project Site will be off Ivar Avenue, Vine Street, and Argyle Avenue.		

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Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
	• Schedule deliveries and pick-ups of construction materials during non-peak travel periods to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods. • As parking lane and/or travel lane closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles, should be implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures. **TRAF-PDF-3: Construction Worker Parking Plan.** The Applicant will prepare a Construction Worker Parking Plan prior to commencement of construction to identify and enforce parking location requirements for construction workers. The Construction Worker Parking Plan will include, but not be limited to, the following elements as appropriate: • During construction activities when construction worker parking cannot be accommodated on the Project Site, the plan will identify alternate parking location(s) for construction workers and the method of transportation to and from the Project Site (if beyond walking distance) for approval by the City 30 days prior to commencement of construction. • Construction workers will not be permitted to park on street.		

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
	• All construction contractors will be provided with written information on where their workers and their subcontractors are permitted to park and provide clear consequences to violators for failure to follow these regulations.		
IV.M Tribal Cultural Resources			
Threshold (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: i) 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)? ii) A resource determined by the lead agency, in its	None	No mitigation measures are required.	Less than Significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
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 Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?			
IV.N.1 Wastewater			
Threshold (a): Would the Project require or result in the relocation or construction of new or expanded water or wastewater treatment or storm water, drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effect?	None	No mitigation measures are required.	Less than Significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
Threshold (b): 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?	None	No mitigation measures are required.	Less than Significant
IV.N.2 Water Supply			
Threshold (a): Would the Project require or result in relocation or construction of new or expanded water facilities, the construction or relocation of which would cause significant environmental effects?	**TRAF-PDF-1** (see above)	No mitigation measures are required.	Less than Significant
Threshold (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?	**WS-PDF- 1: Water Conservation Features.** The Project will provide the following specific water efficiency features: • ENERGY STAR Certified Residential Clothes Washers – Front-loading, capacity of 4.5 cubic feet, with Integrated Water Factor of 2.8. • ENERGY STAR Certified Commercial Clothes Washers – Front-loading, capacity of 4.5 cubic feet, with Integrated Water Factor of 2.8.	No mitigation measures are required.	Less than Significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
	• ENERGY STAR Certified Residential Dishwashers – Standard with 3.2 gallons/cycle. • High-Efficiency Toilets (dual flush) with a flush volume of 0.8 gallons per flush for liquid waste and 1.28 gallons per flush for solid waste. Per Ordinance No. 180,822, Section 125,02, the toilets would have an effective flush volume of 0.96 gallons per flush. • Install a meter on the pool make-up line so water use can be monitored and leaks can be identified and repaired. • Landscaping – Approximately 52 percent of the total proposed landscaping is classified as low water use. Approximately 18 percent of the total proposed landscaping is classified as very low water use, which is considered drought-tolerant enough to require no irrigation by Model Water Efficient Landscape Ordinance. • Leak Detection System for swimming pools and Jacuzzi. • Overhead spray (8 percent) and drip irrigation (92 percent) for landscaped areas. • Pool splash troughs around the perimeter that drain back into the pool. • Proper Hydro-zoning/Zoned Irrigation. • Reuse pool backwash water for irrigation.		

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
	• Water-Saving Pool Filter. • Waterless urinals for commercial uses.		
IV.N.3 Solid Waste			
Threshold (a): 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?	None	No mitigation measures are required.	Less than Significant
Threshold (b): Would the Project comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	None	No mitigation measures are required.	Less than Significant
IV.O Energy Conservation and Infrastructure			
Threshold (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?	**GHG-PDF-1** (see above) **WS-PDF-1** (see above)	No mitigation measures are required.	Less than Significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
Threshold (b): Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	**GHG-PDF-1** (see above) **WS-PDF-1** (see above)	No mitigation measures are required.	Less than Significant
Threshold (c): Would the Project require or result in the relocation or construction of new or expanded electric power and natural gas facilities, the construction or relocation of which could cause significant environmental effects?	None	No mitigation measures are required.	Less than Significant

SOURCE: ESA, 2020.

I. Introduction

1. Purpose of the Draft EIR

As described in Sections 15121(a) and 15362 of the California Environmental Quality Act (CEQA) Guidelines, an Environmental Impact Report (EIR) is an informational document that will inform decision-makers and the general public of the environmental impacts resulting from the project, identify possible ways to minimize any significant effects, and consider reasonable project alternatives. The City of Los Angeles (City) is the Lead Agency under the CEQA responsible for preparing this Draft EIR. This Draft EIR has been prepared in conformance with CEQA (California Public Resources Code [PRC] Section 21000 et seq.), and the CEQA Guidelines (California Code of Regulations [CCR], Title 14, Section 15000 et seq.). The primary CEQA Guidelines sections governing the content of this document are CEQA Guidelines Sections 15120 through 15132 (Contents of an EIR), and CEQA Guidelines Section 15161 (Project EIR).

The City is responsible for processing and approving the Project pursuant to PRC Section 20167. The City will consider the information in this Draft EIR, along with other information that may be presented during the CEQA process, including the Initial Study and a Final EIR. The EIR will be used in connection with all other permits and all other approvals necessary for the construction and operation of the Hollywood Center Project (Project). The EIR will be used by the City's Department of City Planning (DCP); Department of Building and Safety (LADBS); Department of Transportation (LADOT); and Department of Public Works (LADPW), including the Bureaus of Engineering (BOE) and Sanitation (LASAN); and other responsible public agencies that must approve activities undertaken with respect to the Project.

In accordance with CEQA Guidelines Section 15121, this Draft EIR provides specific information regarding the environmental effects associated with development of the Project Site and ways to minimize any significant environmental effects through mitigation measures or reasonable alternatives to the Project. This Draft EIR complies with CEQA Guidelines Section 15064, which discusses determining the significance of the environmental effects caused by a project. For some effects, significant environmental impacts cannot be mitigated to a level considered less than significant; in such cases, impacts are considered significant and unavoidable. In accordance with CEQA Guidelines Section 15093(b) , if a public agency approves a project that has significant impacts that are not substantially mitigated (i.e., significant unavoidable impacts where impacts cannot be mitigated to less-than-significant levels), the agency must state in writing the specific reasons for approving the project, based on the Final EIR and any

other information in the public record for the project. This is known as a "statement of overriding considerations."

This document analyzes the environmental effects of the Project, as described in detail in Chapter II, *Project Description*, of this Draft EIR to the degree of specificity appropriate to the actions by the Project, as required under CEQA Guidelines Section 15146. This analysis considers the actions associated with the Project to determine the short-term and long-term effects associated with their implementation. This Draft EIR discusses both the direct and indirect impacts of this Project, as well as the cumulative impacts associated with other past, present, and reasonably foreseeable future projects. CEQA requires the preparation of an objective, full disclosure document to inform agency decision-makers and the general public of the direct and indirect environmental effects of the proposed action, including mitigation measures and reasonable alternatives that can reduce or eliminate any identified significant adverse impacts.

2. EIR Public Review Process

In compliance with the CEQA Guidelines, the City has taken steps to provide opportunities for participation in the environmental process. During the preparation of the Draft EIR, an effort was made to contact various State, regional, and local government agencies and other interested parties to solicit comments and inform the public of the Project. As further described below, this included the distribution of an Initial Study and Notice of Preparation (NOP), which included noticing for a public scoping meeting.

a) Initial Study

In accordance with CEQA Guidelines Section 15063(a), the City prepared an Initial Study. The Initial Study determined that the Project had the potential to result in significant impacts associated with a number of environmental issues. As a result, the Initial Study determined that this Draft EIR should address those issues where the Project could result in significant environmental impacts and consider mitigation measures.

The Draft EIR focuses primarily on changes in the environment that would result from the Project, individually and cumulatively with other development projects. The Draft EIR identifies potentially significant direct and indirect impacts resulting from construction and operation of the Project and provides Project Design Features (PDF) and mitigation measures to reduce or avoid such effects. Based on public input and the results of the Initial Study, this Draft EIR addresses environmental effects in the following areas:

- Aesthetics (Informational)[1]
- Air Quality
- Cultural Resources (Historic, Archaeological, and Human Remains)
- Geology and Soils (including Paleontological Resources)
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services (Fire Protection, Police Protection, Schools, Parks and Recreation, and Libraries)
- Transportation and Traffic
- Tribal Cultural Resources
- Utilities and Service Systems (Wastewater, Water Supply, and Solid Waste)
- Energy Conservation and Infrastructure

Based on the Initial Study, issues for which no significant impacts are anticipated to occur are addressed in Chapter VI, *Other CEQA Considerations*, of this Draft EIR. See also the Initial Study in Appendix A-2 of this Draft EIR.

b) Notice of Preparation

Pursuant to the provision of CEQA Guidelines Section 15082, the City circulated an NOP to State, regional, and local agencies, interested organizations, and members of the public for a 30-day period, commencing August 28, 2018 and ending September 27, 2018. The purpose of the NOP was to formally convey that the City was preparing a Draft EIR for the Project and to solicit input regarding the scope and content of the Draft EIR. See Appendix A-1, NOP, of this Draft EIR.

c) Public Scoping Meeting

The NOP included notification that a public scoping meeting would be held to further inform public agencies and other interested parties of the Project and to

[1] Because the Project meets certain land use and transportation criteria under Public Resources Code (PRC) Section 21099(d) and Zoning Information (ZI) No. 2452, environmental impacts related to scenic vistas, scenic resources, aesthetic character, and light and glare are not considered significant and these analyses provided in this Draft EIR are for informational purposes only. See Section IV.A, *Aesthetics*, of this Draft EIR, for further details and explanation of the impacts analyzed therein.

solicit input regarding the Draft EIR. The public scoping meeting was held on September 12, 2018, from 6:00 P.M. to 8:00 P.M. at the First Presbyterian Church of Hollywood, located at 1760 N. Gower Street, Los Angeles, CA 90028. The meeting was held in an open house or workshop format and provided public agencies and interested parties the opportunity to view materials, ask questions, and provide oral and written comments to the City regarding the scope and focus of the Draft EIR as described in the NOP and Initial Study. The presentation materials and other documentation from the scoping meeting are provided in Appendix A-3, Scoping Meeting Materials, of this Draft EIR.

d) Comments Received

A total of 204 written comment letters and emails responding to the NOP were submitted to the City. Responses to the NOP were provided by various public agencies and organizations, including the California Department of Conservation, California Geological Survey (CGS), California Department of Toxic Substances Control (DTSC), California Department of Transportation (Caltrans), Los Angeles County Metropolitan Transportation Authority (Metro), South Coast Air Quality Management District (SCAQMD), Southern California Association of Governments (SCAG), and the City of Los Angeles Bureau of Sanitation (LASAN) Wastewater Engineering Services Division. Additional comments were received from various organizations, business, interested parties, and area residents. In addition, an estimated 68 individuals attended the public scoping meeting. Public comments received during the NOP circulation period are provided in Appendix A-4, NOP and Scoping Meeting Comments, of this Draft EIR, and are summarized in the Executive Summary.

3. Format of the Draft EIR

The Draft EIR includes an Executive Summary, eight Chapters, and appendices, which are organized as follows:

Executive Summary. This section of the Draft EIR provides an overview of the entire document in a concise, summarized format. It briefly describes the Project (location and key Project features), the CEQA review process and focus, identifies effects found to be significant and unavoidable, identifies areas of controversy, provides a summary of the Project alternatives (descriptions and conclusions regarding comparative impacts), and provides a summary of Project impacts, PDF and mitigation measures, and the level of impact significance following implementation of mitigation measures.

I Introduction. This section describes the purpose of the EIR, including CEQA compliance requirements, the steps undertaken to date regarding implementation of the CEQA process, and the Draft EIR's organization.

II Project Description. This section describes the location, objectives, and physical and operational characteristics of the Project.

III Environmental Setting. This section presents an overview of the Project's environmental setting, including on-site and surrounding land uses. This section also provides a list and the mapped locations of past, present, and probable future projects (i.e., related projects) considered in the analysis of potential Project contributions to cumulative impacts.

IV Environmental Impact Analysis. This section contains the environmental setting, regulatory framework, methodology, thresholds of significance, Project characteristics and/or PDF, Project-specific and cumulative impact analyses, mitigation measures, and conclusions regarding the level of significance after mitigation for each of the following environmental issues: (A) Aesthetics[2]; (B) Air Quality; (C) Cultural Resources; (D) Geology and Soils; (E) Greenhouse Gas (GHG) Emissions; (F) Hazards and Hazardous Materials; (G) Hydrology and Water Quality; (H) Land Use and Planning; (I) Noise; (J) Population, Housing, and Employment; (K) Public Services – Fire Protection, Police Protection, Schools, Parks and Recreation, and Libraries; (L) Transportation and Traffic; (M) Tribal Cultural Resources; (N) Utilities and Service Systems – Wastewater, Water Supply and Infrastructure, Solid Waste; and (O) Energy Conservation and Infrastructure.

V Alternatives. This section describes a reasonable range of alternatives to the Project, including: Alternative 1 - No Project/No Build Alternative; Alternative 2 - Development under Existing Zoning Alternative; Alternative 3 - Reduced Maximum Height Alternative; Alternative 4 - Mixed Office and Hotel Alternative; Alternative 5 - Proposed Community Plan Update Compliant Alternative; Alternative 6 - Above-Grade Parking Alternative; Alternative 7 - Primarily Office Alternative; and Alternative 8 - Mixed Office and Residential Alternative. This section also evaluates the environmental effects of the alternatives for each issue area analyzed in the Draft EIR.

VI Other CEQA Considerations. This section includes a discussion of issues required by CEQA that are not covered in other chapters. This includes significant unavoidable impacts, reasons why the Project is being proposed notwithstanding significant unavoidable impacts, significant irreversible environmental changes, growth-inducing impacts, potential secondary effects caused by the implementation of the mitigation measures for the Project, and effects found not to be significant.

[2] As stated above in Footnote 1, Aesthetics are discussed in this Draft EIR for informational purposes only.

VII References. This section lists the references and sources used in the preparation of this Draft EIR.

VIII List of EIR Preparers and Organizations and Persons Contacted. This section lists the persons, public agencies, and organizations that were consulted or who contributed to the preparation of this Draft EIR.

IX Acronyms and Abbreviations. This section defines acronyms used in the Draft EIR.

The Environmental Analyses in this Draft EIR are supported by the following appendices:

- Appendix A – Notice of Preparation (NOP), Initial Study, Scoping Meeting Materials, and NOP and Scoping Meeting Comments
  - A-1 NOP
  - A-2 Initial Study
  - A-3 Scoping Meeting Materials
  - A-4 NOP and Scoping Meeting Comments
- Appendix B – Environmental Leadership Development Project Application and Certifications
- Appendix C – Senate Bill 375 Memorandum
- Appendix D – Tree Report
- Appendix E – Air Quality/Greenhouse Gas Emissions Technical Documentation
  - E-1 Technical Appendix for Air Quality/Greenhouse Gas Emissions
  - E-2 Freeway Health Risk Assessment
- Appendix F – Cultural Resources Documentation
  - F-1 Historical Resources Technical Report
  - F-2 Phase I Cultural Resources Assessment
- Appendix G – Geotechnical and Paleontological Resources Documentation
  - G-1 2015 Fault Study
  - G-2 2019 Surface Fault Rupture Hazard Evaluation Report
  - G-3 Geotechnical Investigation
  - G-4 Paleontological Resources Assessment Report

- Appendix H – Hazards and Hazardous Materials Documentation
  - H-1 Phase I Environmental Site Assessment
  - H-2 Phase II Environmental Site Assessment
  - H-3 Underground Storage Tank Removal Memorandum & LAFD Closeout Letter
- Appendix I – Hydrology and Water Quality Report
- Appendix J – Land Use Plans and Policies: Project Consistency Tables
- Appendix K – Noise and Vibration Technical Appendix
  - K-1 Construction Noise and Vibration Study
  - K-2 Construction Traffic and Operational Noise Study
- Appendix L – Population, Housing, and Employment Projection Documentation
- Appendix M – Public Service Provider Correspondence
  - M-1 Los Angeles Fire Department Correspondence
  - M-2 Los Angeles Police Department Correspondence
  - M-3 Los Angeles Unified School District Correspondence
  - M-4 Los Angeles Department of Recreation and Parks Correspondence
  - M-5 Los Angeles Public Library Correspondence
- Appendix N – Transportation Analysis
  - N-1 Traffic Assessment
  - N-2 LADOT Correspondence Approving the Traffic Study
- Appendix O – Tribal Cultural Resources Report
- Appendix P – Utilities Documentation
  - P-1 Utility Infrastructure Technical Report
  - P-2 Water Supply Assessment
- Appendix Q – Energy Calculation Worksheets
- Appendix R – Alternatives Analyses
- Appendix S – Chapter 6.5 of the Public Resources Code

4. Public Review of the Draft EIR

The Draft EIR is subject to a 45-day review period in which the document is made available to responsible and trustee agencies and interested parties. In compliance with the provision of Sections 15085(a) and 15087(a)(1) of the CEQA Guidelines, the City, serving as the Lead Agency: (1) published a Notice of Completion (NOC)

and a Notice of Availability (NOA) of a Draft EIR which indicated that the Draft EIR was available for review at the Department of City Planning (221 N. Figueroa Street, Suite 1350, Los Angeles, CA 90012); (2) provided a copy of the NOC/NOA and Draft EIR to the Los Angeles Central Library, Frances Howard Goldwyn – Hollywood Regional Library, Will & Ariel Durant Branch Library, and John C. Fremont Branch Library; (3) posted the NOC/NOA and the Draft EIR on the City's website at https://planning.lacity.org/development-services/eir; (4) prepared and transmitted the NOC to the State Clearinghouse; (5) sent a copy of the NOC/NOA to all property owners and occupants within 500 feet of the Project Site; and (6) sent a copy of the NOC/NOA to the last known name and address of all organizations and individuals who previously requested such notice in writing or attended public meetings about the Project. Proof of publication is available at the City. The public review period commenced on April 16, 2020 and will end on June 1, 2020 for a total of 47 days.

Any public agency or members of the public desiring to comment on the Draft EIR must submit their comments in writing or send them via email to the following address prior to the end of the public review period:

Mail: *Mindy Nguyen*
City of Los Angeles
Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, California 90012

Email: *mindy.nguyen@lacity.org*

Upon the close of the public review period, the City will proceed to evaluate and prepare responses to all relevant oral and written comments received from public agencies and other interested parties during the public review period. A Final EIR will then be prepared. Pursuant to CEQA Guidelines Section 15132, the Final EIR will consist of possible revisions to the Draft EIR, comments submitted by responsible agencies or reviewing parties during the public circulation period for the Draft EIR, and City responses to those comments. After the Final EIR is completed and at least 10 days prior to its certification, responses to comments made by public agencies on the Draft EIR will be provided to the commenting agencies.

5. CEQA Streamlining

Senate Bill (SB) 375 (Chapter 728, Statutes of 2008) was adopted by the State on September 30, 2008, and established mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions. SB 375 also added Section 21159.28 to the PRC, which provides that residential and mixed-use projects that meet certain criteria are eligible for CEQA streamlining, provided that the California Air Resources Board (CARB) has accepted the Metropolitan

Planning Organization's (MPO) determination that the Project area's Sustainable Communities Strategy (SCS) achieves the GHG emission reduction targets established by CARB for the region.

Under SB 375, CARB is required, in consultation with the State's MPOs, to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035. In February 2011, CARB adopted the final GHG emissions reduction targets for the Southern California Association of Governments (SCAG), which is the MPO for the region in which the City of Los Angeles is located.[3] The target includes a per capita reduction of 8 percent for 2020 and 13 percent for 2035 compared to the 2005 baseline.[4] Of note, the proposed reduction targets explicitly exclude emission reductions expected from the vehicle tailpipe emissions standards (i.e., passenger vehicle and light-duty truck Pavley standards under Assembly Bill [AB] 1493) and the low carbon fuel standard regulations. SB 375 requires that the reduction target must be incorporated within that region's Regional Transportation Plan (RTP), which is used for long-term transportation planning, in an SCS.

On April 7, 2016, SCAG adopted the 2016-2040 RTP/SCS. Using growth forecasts and economic trends, the 2016-2040 RTP/SCS provides a vision for transportation throughout the region for the next 25 years. The 2016-2040 RTP/SCS demonstrates that it would achieve and exceed the applicable GHG emission-reduction targets set by CARB with an 8-percent reduction by 2020, 18-percent reduction by 2035, and 21-percent reduction by 2040 compared to the 2005 level on a per capita basis.[5] CARB has accepted the SCAG GHG quantification determination in the 2016-2040 RTP/SCS and that the 2016-2040 RTP/SCS, if implemented, would achieve the applicable 2020 and 2035 GHG emission reduction targets established by CARB.6

In addition, pursuant to Public Resources Code Section 21187 and paragraph (3) of subdivision (b) of Public Resources Code Section 21092, the City, as lead agency, issued and distributed the following public notice in 12-point type stating the following:

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3 California Air Resources Board (CARB), Sustainable Communities, https://www.arb.ca.gov/cc/sb375/sb375.htm, accessed November 4, 2019.

4 In March 2018, the CARB updated the Senate Bill (SB) 375 targets to require 8 percent reduction by 2020 and a 19 percent reduction by 2035 in per capita passenger vehicle greenhouse gas (GHG) emissions. As this reduction target was updated after the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS), it is expected that the next iteration of the RTP/SCS will be updated to include this target.

5 SCAG, 2016-2040 RTP/SCS, April 2016.

6 CARB, Southern California Association of Governments' (SCAG) 2016 Sustainable Communities Strategy (SCS) ARB Acceptance of GHG Quantification Determination, June 2016.

> "THE APPLICANT HAS ELECTED TO PROCEED UNDER CHAPTER 6.5 (COMMENCING WITH SECTION 21178) OF THE PUBLIC RESOURCES CODE, WHICH PROVIDES, AMONG OTHER THINGS, THAT ANY JUDICIAL ACTION CHALLENGING THE CERTIFICATION OF THE EIR OR THE APPROVAL OF THE PROJECT DESCRIBED IN THE EIR IS SUBJECT TO THE PROCEDURES SET FORTH IN SECTIONS 21185 TO 21186, INCLUSIVE, OF THE PUBLIC RESOURCES CODE. A COPY OF CHAPTER 6.5 (COMMENCING WITH SECTION 21178) OF THE PUBLIC RESOURCES CODE IS INCLUDED BELOW."

A copy of Chapter 6.5 of the Public Resources Code is included in Appendix S.

a) CEQA Streamlining Criteria in Public Resources Code Section 21159.28

PRC Section 21159.28 establishes the following eligibility criteria for CEQA streamlining:

- The project must be either a residential or mixed-use residential project where at least 75 percent of the total building square footage of the project consists of residential use, or a project that is a Transit Priority Project (TPP) as defined in PRC Section 21155.
- The project must be consistent with the use designation, density, building intensity, and applicable policies specified for the project area in a CARB-accepted SCS.
- The project must incorporate the mitigation measures required by an applicable prior environmental document. In the case of the 2016-2040 RTP/SCS, the applicable environmental document is the Program Environmental Impact Report (PEIR) that was prepared for the plan. The 1988 Hollywood Community Plan is in effect for the Hollywood Community Plan area in which the Project Site is located. However, the 1988 Hollywood Community Plan does not contain mitigation measures applicable to the Project.

In cases where all of the criteria are met, PRC Section 21159.28 states that no environmental analysis is required of: (1) project-specific or cumulative impacts from cars and light-duty truck trips generated by the project on global warming or the regional transportation network; (2) growth-inducing impacts; and (3) a reduced residential density alternative that addresses the effects of car and light-duty truck trips generated by the project.

A Technical Memorandum was prepared by ESA to evaluate the Project's eligibility for CEQA streamlining per the provisions of PRC Section 21159.28, which is included in Appendix C to this Draft EIR. As summarized therein, the Project would be consistent with the use designation, density, and intensity levels that have been established for the Project Site. In addition, the Project would consist of more than

75 percent of the total building square footage as residential development. The Project would be consistent with the applicable policies set forth in the 2016-2040 RTP/SCS. The Project is consistent with the applicable mitigation measures set forth in the PEIR for the 2016-2040 RTP/SCS. Thus, all of the SB 375 CEQA streamlining requirements have been met by the Project. Accordingly, assessments of the following issues, as provided, within this Draft EIR are provided for informational purposes only: (1) Project-specific and cumulative impacts from cars and light-duty truck trips generated by the Project on global warming or the regional transportation network; (2) growth-inducing impacts; and (3) a reduced residential density alternative that addresses the effects of car and light-duty truck trips generated by the Project.

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II. Project Description

1. Introduction

MCAF Vine LLC, 1750 North Vine LLC, 1749 North Vine Street LLC, 1770 Ivar LLC, 1733 North Argyle LLC, and 1720 North Vine LLC (collectively, the Applicant) propose a new mixed-use development (Project) on an approximately 4.46-acre (194,495-square-foot) site (Project Site) in the Hollywood Community Plan area of the City of Los Angeles (City).[1] The Project Site is generally bounded by Yucca Street on the north, Ivar Avenue on the west, Argyle Avenue on the east, and adjacent development and Hollywood Boulevard on the south, and is bifurcated by Vine Street. The portion of the Project Site located between Ivar Avenue and Vine Street is identified as the "West Site", and the portion located between Vine Street and Argyle Avenue is identified as the "East Site".

The Project Site is comprised of 10 individual parcels and currently occupied by a building leased by the American Musical and Dramatic Academy (AMDA) for storage of sets and props (no educational/campus activities/classes), and a surface parking lot on the West Site; and the Capitol Records Building and Gogerty Building (i.e., the Capitol Records Complex), occupied by Capitol Records, a surface parking lot that serves the Capitol Records Complex and general public parking on the East Site. Under the Project, the Capitol Records Complex would be preserved, although portions of its supporting parking area, along with some existing surface parking adjacent to the Capitol Records Complex, would be reconfigured and relocated to a dedicated portion of the Project parking garage proposed on the East Site.[2] With the exception of 22 surface parking spaces that would remain adjacent to the Capitol Records Building on the East Site, the remaining surface parking on the Project Site would be removed in order to

[1] The Hollywood Community Plan (1988) identifies the area located generally on both sides of Hollywood and Sunset Boulevards between La Brea and Gower Street as "Hollywood Center." However, the "Hollywood Center Project," is not focused on and would not occupy the larger "Hollywood Center" area identified in the Hollywood Community Plan, rather, it is a private development project that would occupy a subset of this area.

[2] A portion of the parking lot adjacent to the Capitol Records Complex is proposed to be reconfigured and converted into open space under the Project. However, the portion to be reconfigured is under lease to Capitol Records and subject to Capitol Records' consent during the term of the Capitol Records Lease. Further detail is provided below under Subsection 7.d, *Open Space, Landscaping, and Public Art*.

develop the Project's proposed mix of land uses. Overall, the Project would contain approximately 1,287,150 square feet of developed floor area, including: [3]

- Residential uses (1,005 residential housing units comprised of 872 market-rate and 133 senior affordable housing units), for a total of approximately 1,256,974 square feet;
- Commercial uses (retail and restaurant uses) for a total of approximately 30,176 square feet;
- Open space (publicly accessible open space, outdoor common open space, indoor common open space, and private balconies), for a total of approximately 166,582 square feet;
- Vehicle parking (up to 1,521 spaces); and
- Bicycle parking (up to 551 spaces).[4]

The residential and commercial uses would be located within four new buildings: a 35-story building on the West Site (West Building); a 46-story building on the East Site (East Building); and two 11-story senior housing buildings, one on each respective Site (West Senior Building and East Senior Building), set aside for Extremely Low and/or Very Low Income households.

Under a proposed East Site Hotel Option (Project with the East Site Hotel Option), the Project would replace 104 residential units within the East Building on Levels 3 through 12, with a 220-room hotel, with no change to the building height and massing. The number of affordable residential units within the East Senior Building would be reduced by 17 units and the height of the building would be reduced from 11 stories to nine stories. Overall, the Project with the East Site Hotel Option would contain approximately 1,272,741 square feet of developed floor area, including:

- Residential uses (884 residential housing units, comprised of 768 market-rate and 116 senior affordable housing units), for a total of approximately 1,112,287 square feet;
- Hotel use (a 220-room hotel and supporting amenities), for a total of approximately 130,278 square feet;
- Commercial uses (retail and restaurant uses), for a total of approximately 30,176 square feet;

[3] Understanding that the Project is seeking certain bonuses and reductions related to floor area pursuant to LAMC Section 11.5.11(e) and California Government Code Section 65915(k) or the Applicable Housing Incentive Program, Project Floor Area numbers used throughout this document, unless otherwise specified, are calculated in accordance with Los Angeles Municipal Code Section 12.03, which excludes basement storage, vertical circulation, and rooms housing building-operating equipment or machinery, but includes residential amenities and lobbies.

[4] The number of bicycle parking spaces is consistent with Ordinance No. 185,480, which was adopted by the Los Angeles City Council on March 27, 2018, under Council File No. 12-1297-S1, and became effective on May 9, 2018.

- Open space (publicly accessible open space, outdoor common open space, indoor common open space, and private balconies), for a total of approximately 150,371 square feet;
- Vehicle Parking (up to 1,521 spaces); and
- Bicycle Parking (up to 554 spaces).

2. Project Location and Surrounding Uses

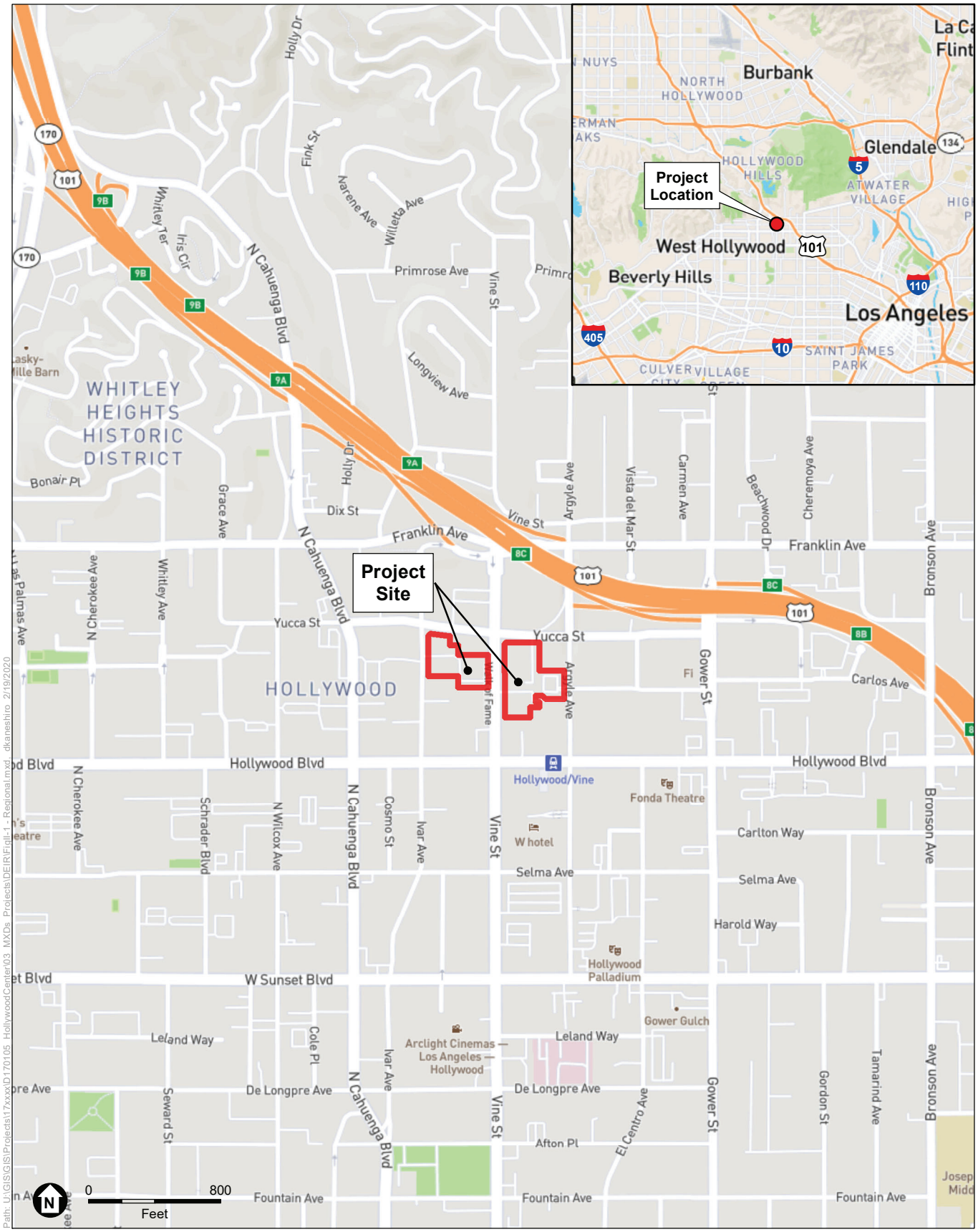
a) Project Location

As shown in **Figure II-1**, *Regional and Site Location Map*, the Project Site is located within the Hollywood Community Plan area of the City, approximately five miles west of Downtown Los Angeles. As shown in **Figure II-2**, *Aerial Photograph of Project Site and Vicinity*, the Project Site spans portions of two City blocks generally bounded by Yucca Street to the north, Argyle Street to the east, adjacent development and Hollywood Boulevard to the south, and Ivar Avenue to the west. The Project Site is comprised of the West Site and East Site, bifurcated by Vine Street, which runs north/south.

b) Surrounding Uses

The Project Site and vicinity are located within a part of the Regional Center of Hollywood that is urbanized and generally built out. A Regional Center is defined by the Land Use Chapter of the General Plan Framework Element as a high-density area, and a focal point of regional commerce, identity, and activity. As depicted in Figure II-2, land uses in the vicinity of the Project Site are comprised primarily of commercial, tourist and entertainment-related commercial uses, offices, hotels, and low- to high-density residential developments that vary in building style and period of construction.

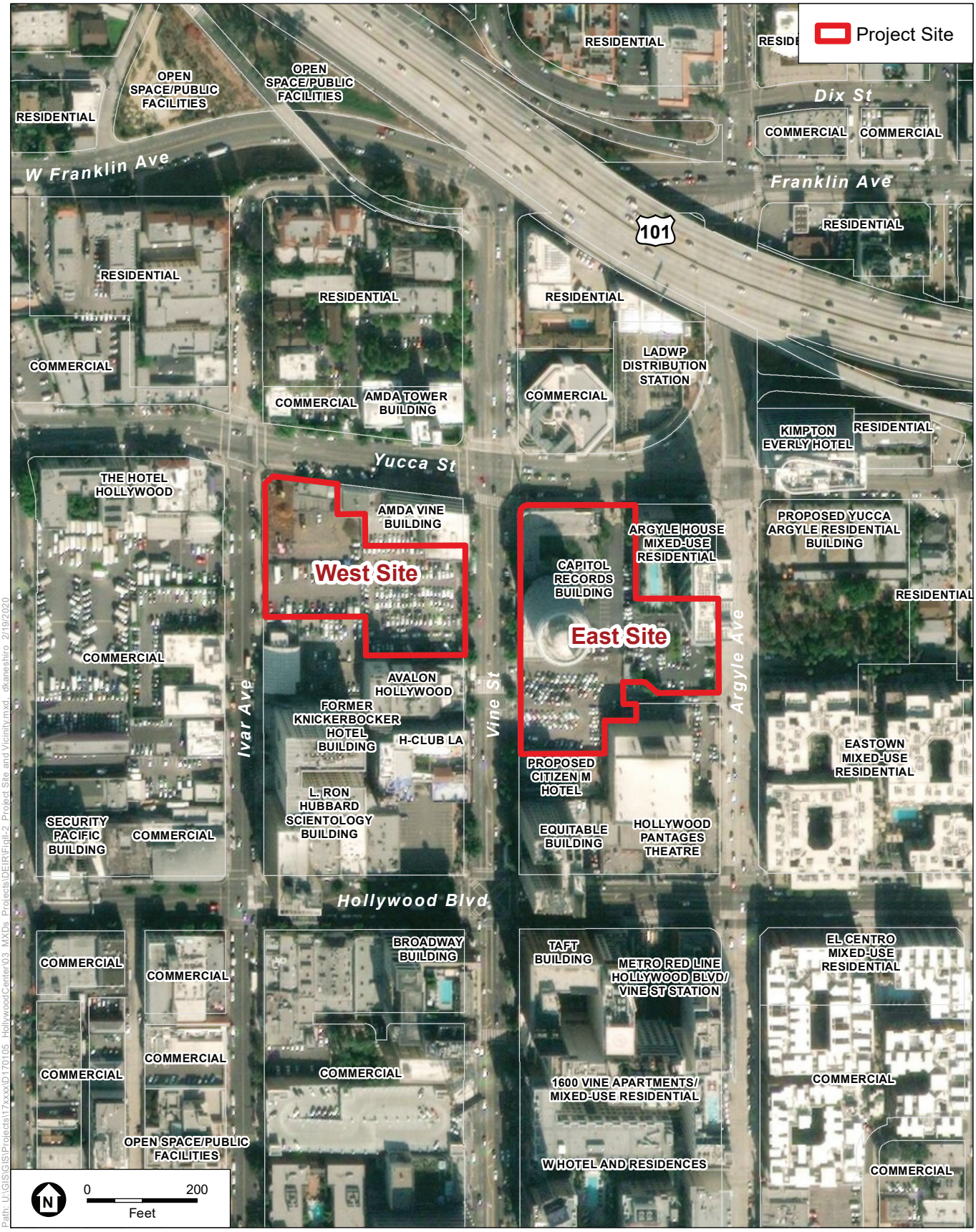
Adjacent development to the north of the Project Site include mixed-use buildings ranging from one to 18 stories, surface parking lots, and the two-story Los Angeles Department of Water and Power (LADWP) Distribution Station No. 52. At the northwest corner of the Yucca Street and Vine Street intersection is the eight-story AMDA Tower Building and, at the southwest corner of Yucca Street and Vine Street intersection is the five-story AMDA Vine Building. Together, these two buildings partially comprise the AMDA Los Angeles Campus. Adjacent development to the east of the Project Site include two-story multi-family residential uses and a seven-story, mixed-use building. Adjacent development to the south of the Project Site include a seven-story, mixed-use building; a one-story restaurant; surface parking; the three-story Hollywood Pantages Theatre; and a 12-story, mixed-use building. Adjacent development to the west of the Project Site



SOURCE: Open Street Map, 2018.

Hollywood Center Project

Figure II-1
Regional and Site Location Map



SOURCE: Google Earth, 2016.

Hollywood Center Project

Figure II-2
Aerial Photograph of Project Site and Vicinity

include: one- to two-story retail, restaurant, and service uses; an 11-story, senior residential building; and the 14-story L. Ron Hubbard Scientology Building. In addition, the Project Site is located adjacent to portions of the Hollywood Walk of Fame along Vine Street between, Hollywood Boulevard and Yucca Street (on both the west and east sides of the street). A more detailed description of the land uses surrounding the Project Site is provided in Chapter III, *Environmental Setting,* of this Draft EIR under Subsection 1.b, *Surrounding Uses*.

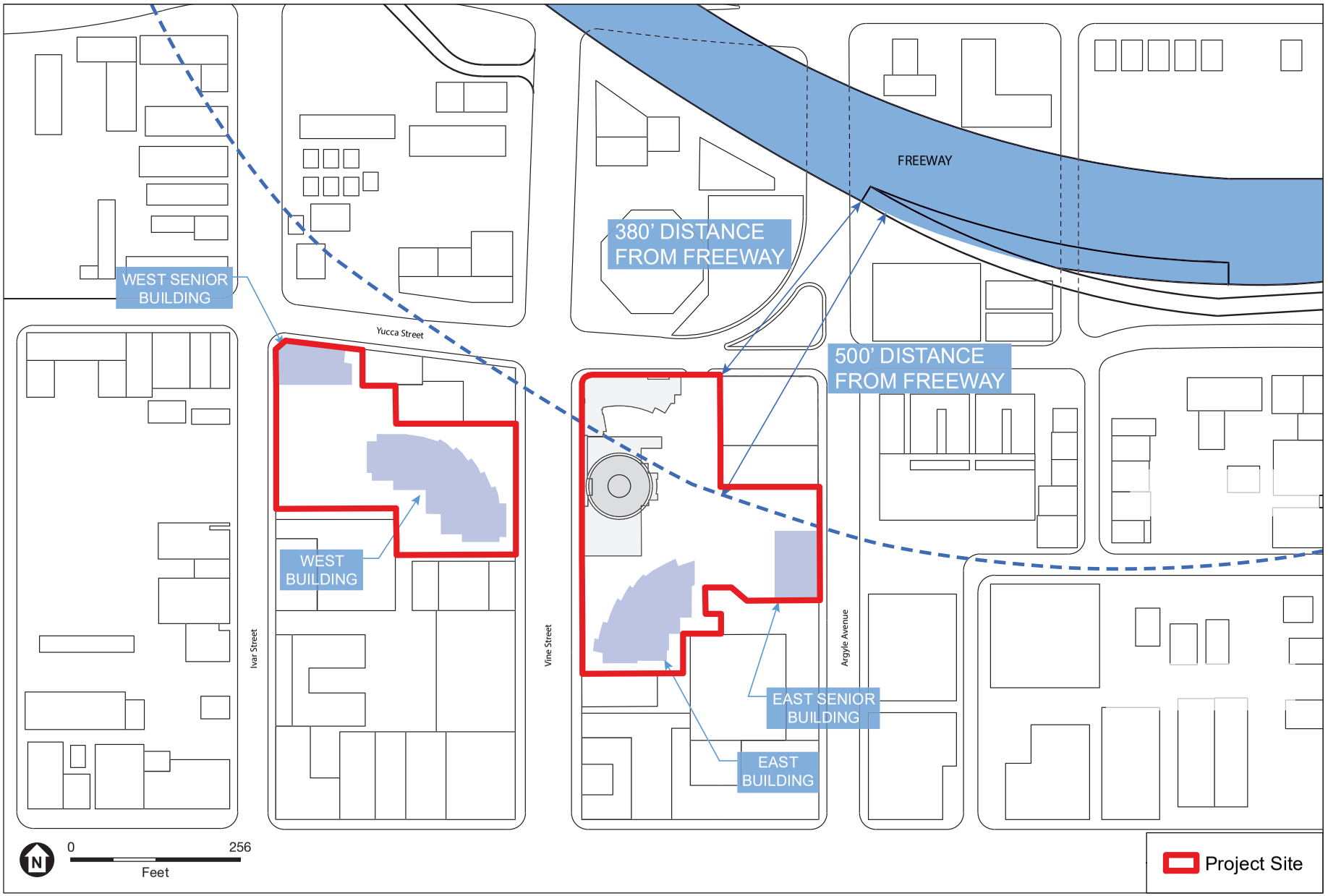
c) Existing Transportation System

The Project Site is served by a network of regional transportation facilities that provide access to the greater metropolitan area. As shown in **Figure II-3**, *Approximate Distance from Hollywood Freeway*, regional access is provided by the Hollywood Freeway (US-101), which is approximately 380 feet north of the East Site's northernmost boundary; the Santa Monica Freeway (I-10), which is approximately five miles to the south; the Harbor Freeway (I-110), which is approximately five miles to the southeast; the Golden State/Santa Ana Freeway (I-5), which is approximately five miles to the east; the Ventura Freeway (SR-134), which is approximately four miles to the north; and the San Diego Freeway (I-405) is approximately eight miles to the southwest.

As shown in **Figure II-4**, *Public Transit Stops in Project Vicinity*, various public transit stops operated by the Los Angeles County Metropolitan Transportation Authority (Metro) and Los Angeles Department of Transportation (LADOT) are located in proximity to the Project Site. The nearest Metro Station is the Metro Red Line Hollywood/Vine Station, located approximately 600 feet south of the Project Site. Bus transit access is provided along a number of Metro and LADOT bus routes with multiple stops located within one block of the Project Site. These bus routes include Metro Rapid Line 780, Metro Local Lines 180/181, 210, 212/312, 217, and 222, and LADOT Downtown Area Short Hop (DASH) Hollywood, DASH Beachwood Canyon, and DASH Hollywood/Wilshire.

3. Project Background

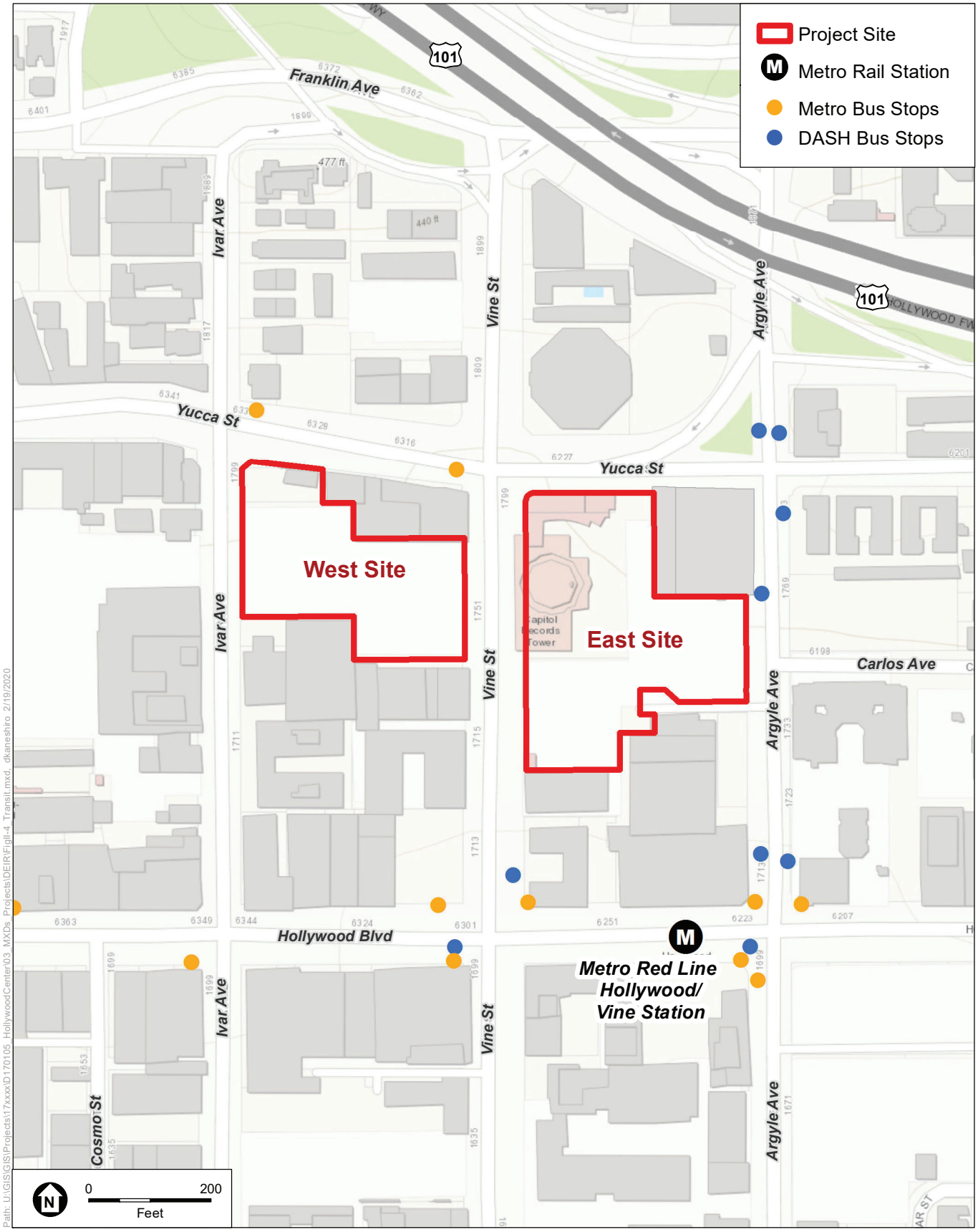
The Applicant submitted an entitlement application to the City for a different project at the same Project Site in 2008. On or about July 24, 2013, the Los Angeles City Council approved and adopted Ordinance No. 182,636 (Case No. CPC-2008-3440-ZC-CUB-CU-ZV-DA-HD, VTT-71837) and certified an Environmental Impact Report (ENV-2011-675-EIR) and State Clearinghouse [SCH] No. 2011041049) for entitlements related to the Project Site. On or about April 30, 2015, the Los Angeles Superior Court issued a ruling invalidating the City Council's adoption and approval of Ordinance No. 182,636 and ENV-2011-675-EIR. On or about July 31, 2019, the Second District Court of Appeal affirmed the trial court's ruling.



SOURCE: Handel Architects and ESA, 2018
Note: Distances are approximate.

Hollywood Center Project

Figure II-3
Approximate Distance from Hollywood Freeway



SOURCE: ESRI, 2018; LADOT, 2016; Metro, 2018

Hollywood Center Project

Figure II-4
Public Transit Stops in Project Vicinity

This analysis contained in this EIR is for a new Project and does not, in any way, rely on the environmental review prepared for the previous project, which was invalidated.

4. Existing Project Site Conditions

The Project Site is entirely developed and is used primarily for surface parking and storage, with the exception of the historic Capitol Records Complex. At present, the Project Site contains 48 trees, 14 of which are considered "significant" trees. "Significant" trees are defined by the City of Los Angeles Planning Department as any tree with a trunk diameter of eight inches or larger. In addition, there are 16 trees, which are within the City's public rights-of-way along roadways adjacent to the Project Site. Of the 16 rights-of-way trees, three are located along Ivar Avenue, two along Yucca Street, one along Argyle Avenue, and 10 along Vine Street. None of the 48 trees are considered "protected" under City of Los Angeles Tree Preservation Ordinance No. 177,404, which defines "protected" trees as coast live oak, western Sycamore, Southern California black walnut, or California bay laurel with trunk diameters of four inches or greater.[5]

Both the West and East Sites slope down from northeast to southwest with elevations ranging from approximately 404 feet above mean sea level (amsl) to 383 feet amsl (i.e., a grade change of approximately 21 feet). The sidewalk along Vine Street contains the Hollywood Walk of Fame and street trees.

The northern part of the West Site contains an approximately 1,237-square-foot, single-story building constructed in 1978, that is currently leased by AMDA and used on a daily basis for storage of sets and props associated with their performing arts school. The remaining part of the West Site (approximately 77,392 square feet) contains a surface parking lot with a parking attendant kiosk. Existing access to the West Site is provided from two driveways along Vine Street and three driveways along Ivar Avenue. The West Site is enclosed by iron fencing and secured by a lockable gate.

The East Site contains the Capitol Records Complex, which includes the 13-story Capitol Records Building and ancillary studio recording uses; and the two-story Gogerty Building, all of which total approximately 114,303 square feet of existing floor area. As further described in Section IV.C, *Cultural Resources*, of this Draft EIR, both buildings within the Capitol Records Complex are considered historical resources under the California Environmental Quality Act (CEQA) and would not be directly altered by the Project. The remaining part of the East Site (approximately 91,250 square feet) contains surface parking lots with controlled

[5] Carlberg Associates, *Hollywood Center Project – Vine, Ivar, Yucca, and Argyle Streets, Los Angeles, CA 90028 Tree Report*, March 28, 2018, Revised April 11, 2019. Provided in Appendix D of the Draft EIR.

gated access. Existing access to the East Site is provided from one driveway along Vine Street, one driveway along Yucca Street, and one driveway along Argyle Avenue.

In addition, the Project Site is located immediately adjacent to portions of the Hollywood Walk of Fame along Vine Street between Hollywood Boulevard and Yucca Street (on both the west and east sides of the street). The Hollywood Walk of Fame includes sidewalks running west along Hollywood Boulevard from Gower Avenue to La Brea Avenue, and along Vine Street between Yucca Street and Sunset Boulevard. It was formally determined eligible for the National Register by consensus determination through Section 106 review and, therefore, is automatically listed in the California Register. Refer to Section IV.C, *Cultural Resources*, for further discussion and details of the Hollywood Walk of Fame.

5. Land Use and Zoning Designations

a) Community Plan Land Use Designation

The City's Hollywood Community Plan was adopted in 1988 (1988 Hollywood Community Plan) and designates the Project Site as Regional Center Commercial, with corresponding zones of C2, C4, P, PB, RAS3, and RAS4. The 2012 Hollywood Community Plan Update was adopted by the City Council on June 19, 2012, and intended to update the 1988 Hollywood Community Plan to reflect changing land use patterns in the Hollywood Community Plan area. After its adoption, litigation was filed challenging the approval. On February 11, 2014, a superior court judgment issued a decision instructing the City to rescind, vacate, and set aside the approval and related actions. On April 2, 2014, the City adopted Ordinance No. 182,960, which set aside the approval of the 2012 Hollywood Community Plan Update, and had the effect of reverting the zoning designations for the Community Plan Area to those in effect in the 1988 Hollywood Community Plan.

b) Zoning Designation

The Project Site's underlying zoning designation is C4-2D-SN. The C4 Zone allows for a wide variety of land uses, including retail stores, theaters, hotels, broadcasting studios, parking buildings, parks, and playgrounds and permits any land use permitted in the R4 Zone, including multiple residential uses. Height District 2 allows a 6:1 floor area ratio (FAR), with no height limit in conjunction with the C4 Zone. However, the Project Site is subject to D Limitations, pursuant to Ordinance No. 165,659, which restricts lots with Assessor's Parcel Numbers (APN) 5546-004-006, 5546-004-020, 5546-004-021, 5546-004-029, 5546-030-028, 5546-030-031, 5546-030-033, and 5546-030-034 to a 3:1 FAR; and the

corner lot on the southeast corner of Yucca Street and Vine Street, with APN 5546-030-032, to a 2:1 FAR.[6,7]

The SN designation signifies that the Project Site is located within the established boundaries of the Hollywood Signage Supplemental Use District (HSSUD). The Project Site is also designated as Regional Center Commercial under the Hollywood Redevelopment Plan, which establishes a 4.5:1 FAR limitation, or a maximum 6:1 FAR with City Planning Commission approval. In conjunction with a proposed Height District Change requested by the Project Applicant to remove the D Limitation, the Project Site's maximum FAR would be 6:1. By complying with Measure JJJ[8] and setting aside at least 11 percent of the total residential units for Extremely Low and/or Very Low Income households, the Project would be eligible for an 8.1:1 FAR. The Applicant requests up to a 7:1 FAR.

c) Transit Priority Area

The City of Los Angeles Department of City Planning, Zoning Information (ZI) File No. 2452 was developed in response to Senate Bill (SB) 743 to identify Transit Priority Areas (TPAs) in the City and to provide guidelines regarding exemptions to the analysis of aesthetic impacts and parking evaluations within TPAs pursuant to CEQA. Specifically, Section 21099 (d)(1) of the Public Resources Code (PRC) states that a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if: (1) the project is a residential, mixed-use residential, or employment center project; and (2) the project is located on an infill site within a TPA. It should be noted that the definition of aesthetic impacts in Section 21099 does not include or exempt analysis of impacts to historic or cultural resources. PRC Section 21099 defines the criteria for an employment center, infill site, and TPAs. Specifically, "infill site" is defined as a location within an urban area that has been previously developed, or a vacant site where at least 75 percent of the perimeter of the site adjoins an improved public right-of-way. "TPAs" are

6 The D Limitation, per Ordinance No. 165,659, restricts the FAR of all the aforementioned lots to 2:1, with a provision that a project located on these lots can exceed the 2:1 FAR as long as the Community Redevelopment Agency (CRA) Board finds that the project is consistent with the redevelopment plan, that the developer entered into an Owner Participation Agreement (OPA) with the CRA Board, and the project is approved by the City Planning Commission, or City Council on appeal.

7 On September 30, 2019, under authority granted in the Redevelopment Dissolution statutes, the Los Angeles City Council and Mayor approved a resolution and accompanying Ordinance No. 186,325 to transfer from the CRA/LA to the City of Los Angeles all responsibility for land use related plans and functions in the 19 remaining Redevelopment Project Areas. Thus, the City can take action regarding any Redevelopment Plan Amendment or land use approval or entitlement pursuant to Section 11.5.14 and other applicable provisions of the LAMC.

8 Measure JJJ (LAMC Section 11.5.11) added provisions to the LAMC to require projects with 10 or more residential dwelling units, in conjunction with a General Plan Amendment, Zone Change or Height District Change that results in increased allowable residential floor area, density or height, or allows a residential use where previously not allowed density, to either provide affordable units or pay an in-lieu fee.

defined as areas within one-half mile of a major transit stop that is existing or planned. A “major transit stop" is defined as a site containing an existing rail transit station or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. Under ZI File No. 2452, a project shall be considered to be within a TPA if all parcels within the project have no more than 25 percent of their area farther than one-half mile from the major transit stop. The "Citywide Transit Priority Areas” map contained in ZI File No. 2452 identifies that the Project Site is located within a TPA.[9]

The Project is a mixed-use residential development located on an infill site as the Project Site is within an urban area that had been previously developed. Given proximity to regional transportation facilities in the Project vicinity, including the Metro Red Line Hollywood/Vine Station, which is located approximately 600 feet south of the Project Site, the Project Site is located within one-half mile (2,640 feet) of a major transit stop. Therefore, the Project Site is located entirely within a TPA, as defined by the City.

In addition, the Project Site is located within a Southern California Association of Governments (SCAG)-designated High Quality Transit Area (HQTA) as it is located 600 feet north of the Metro Red Line Hollywood/Vine Station.[10] An HQTA is defined as a generally walkable transit village or corridor that is within one-half mile of fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15-minutes or less during peak commute hours. Local jurisdictions are encouraged to focus housing and employment growth within HQTAs.

6. Project Objectives

Section 15124(b) of the CEQA Guidelines states that a project description shall contain “a statement of the objectives sought by the proposed project,” and further states that “the statement of objectives should include the underlying purpose of the project.”

The underlying purpose of the Project is to create a mixed-use development in the Hollywood community that provides residents, employees, and visitors with an active public open space area and Project design that emphasizes the unique highly visible landmarks of the Capitol Records Complex and legacy of the Hollywood area.

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9 City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS), Parcel Profile Report [APN Search]: 5546-004-(006); 020; 021; 029; 032 and 5546-030-(028); 031; 032; 033; 034. Generated February 8, 2018.

10 Southern California Association of Governments, *2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy (2016-2040 RTP/SCS)*, Exhibit 5.1, April 2016, page 77.

As set forth in the CEQA Guidelines, the Project's specific objectives are as follows:

1. Redevelop the Project Site, with a mixed-use development that protects the architectural and historical heritage of the Capitol Records Complex and activates Hollywood Boulevard, Vine Street, and surrounding streets through connected, publicly available landscaped open space, including a paseo with shopping, seating, open air dining, and art installations, and plazas accommodating performances and community focused events.
2. Create a hub of activity surrounding the Capitol Records Complex and the intersection of Hollywood Boulevard and Vine Street, by activating the eastern end of Hollywood Boulevard and the terminus of the Hollywood Walk of Fame, to increase engagement with the Capitol Records Complex.
3. Develop architecturally distinct buildings that are compatible with the Capitol Records Complex through a design that responds to the Capitol Records Building's modernist architectural character, and preserve views of the Capitol Records Building.
4. Maintain prominent views of the Capitol Records Building by providing building setbacks, visual buffers, open space between the Project's new buildings and the Capitol Records Complex, and safe public viewing areas from the proposed paseo and plazas, to maximize view corridors and continue showcasing its distinctive architectural design.
5. Promote local, regional, and State land use and mobility objectives and reduce vehicle miles traveled (VMT) by maximizing infill development within an existing Regional Center near jobs, retail, and entertainment in proximity to transit and transportation infrastructure that encourages pedestrian activity.
6. Provide affordable senior housing with outdoor spaces in proximity to public transportation, allowing an age-specific demographic to continue to live in their residence of preference while maintaining access to services and goods.
7. Cluster jobs and housing near transit by locating a high-density, mixed-use development within a Transit Priority Area.
8. Support the growth of the City's economic base through the introduction of an economically viable project which creates a significant number of construction and permanent jobs.
9. Activate the Hollywood area with commercial opportunities that could serve local employees, generate local tax revenues, and provide new permanent jobs and housing for residents in support of local business.
10. Incorporate sustainable and green building design and construction to promote resource conservation, including waste reduction, efficient water management techniques, and conservation of energy to achieve a LEED-Gold equivalent building.

7. Description of the Project

The Project described below may be carried out with certain modifications pursuant to a proposed East Site Hotel Option. The description of the Project with the East Site Hotel Option is provided below under Subsection 7.(3), *Project with the East Site Hotel Option*.

a) Project Overview

The Project would preserve the Capitol Records Complex and remove the remaining existing uses on the Project Site, including most of the surface parking areas and the single-story building leased by AMDA for storage purposes. The southeastern portion of the existing surface parking adjacent to the Capitol Records Complex contains 97 vehicle parking spaces, which would be retained and relocated.[11] In addition, a five-level subterranean parking garage with one additional level of enclosed at-grade parking would be provided on both the West Site and the East Site.

Four new buildings (two on the West Site and two on the East Site) would be constructed around the existing Capitol Records Complex, surrounded by public open spaces on the ground level. **Table II-1**, *Proposed Development Program*, provides a detailed summary of the Project. As summarized in that table, the total floor area would be approximately 1,287,150 square feet. The maximum building height would be up to 469 feet (35 occupiable stories and one story for mechanical equipment) on the West Site and up to 595 feet (46 occupiable stories and one story for mechanical equipment) on the East Site. The maximum building heights stated here and below for the Project include the bulkheads (non-occupiable additional level, housing only mechanical equipment), as well as all architectural elements (i.e., screen element, elevator shafts, mechanical bulkheads, parapets).

TABLE II-1
PROPOSED DEVELOPMENT PROGRAM

	West Site	East Site	Total (Across Project Site)
Site Area (Pre-Dedication)	78,629 sf	115,866 sf	194,495 sf (4.46 acres)
Site Area (Post-Dedication)[a]	83,792 sf	117,179 sf	200,971 sf (4.61 acres)
Maximum Building Height[b]	469 feet	595 feet	595 feet

[11] The 97 spaces reserved for the Capitol Records Complex are based on an existing Certificate of Occupancy for Capitol Records and is defined by the amount of parking that the City requires.

TABLE II-1
PROPOSED DEVELOPMENT PROGRAM

	West Site	East Site	Total (Across Project Site)
Residential			
Market-Rate Units			
One-Bedroom	195 du	175 du	370 du
Two-Bedroom	198 du	172 du	370 du
Three-Bedroom	56 du	76 du	132 du
Subtotal Market-Rate Units	*449 du*	*423 du*	*872 du*
Subtotal Market-Rate Residential Floor Area	*534,947 sf*	*529,092 sf*	*1,064,039 sf*
Senior Affordable Units			
One-Bedroom	59 du	53 du	112 du
Two-Bedroom	9 du	12 du	21 du
Subtotal Senior Affordable Units	*68 du*	*65 du*	*133 du*
Subtotal Senior Affordable Residential Floor Area	*62,289 sf*	*61,777 sf*	*124,066 sf*
Indoor Residential Amenities, Lobbies and Associated Miscellaneous Support Spaces			
Market-Rate Residential	35,001 sf	26,178 sf	61,179 sf
Senior Affordable Residential	3,815 sf	3,875 sf	7,690 sf
Subtotal Indoor Residential Amenities and Lobbies Floor Area	*38,816 sf*	*30,053 sf*	*68,869 sf*
Commercial			
Restaurant/Retail	12,691 sf	17,485 sf	30,176 sf
Subtotal Commercial Floor Area	*12,691 sf*	*17,485 sf*	*30,176 sf*
Total Floor Area	***648,743 sf***	***638,407 sf***	***1,287,150 sf***
Total Buildable Area for Floor Area Ratio			*1,401,453 sf*
Floor Area Ratio		**6.973:1**[c]	
Parking			
Vehicular Parking[d]			
Required	663 spaces	850 spaces	1,513 spaces
Proposed	837 spaces	684 spaces	1,521 spaces
Bicycle Parking			
Long-Term	247 spaces	242 spaces	489 spaces
Short-Term	30 spaces	32 spaces	62 spaces
Subtotal Bike Parking Spaces	*277 spaces*	*274 spaces*	*551 spaces*

TABLE II-1
PROPOSED DEVELOPMENT PROGRAM

	West Site	East Site	Total (Across Project Site)
Open Space			
Publicly Accessible Open Space	*8,932 sf*	*24,990 sf*	*33,922 sf*
Outdoor Common Open Space	33,124 sf	19,978 sf	53,102 sf
Indoor Common Open Space	22,246 sf	13,712 sf	35,958 sf
Subtotal Common Open Space	*55,370 sf*	*33,690 sf*	*89,060 sf*
Private Balconies	22,450 sf	21,150 sf	43,600 sf
Total Open Space Provided	**86,752 sf**	**79,830 sf**	**166,582 sf**
Total Open Space Required	*61,075 sf*	*59,100 sf*	*120,175 sf*

NOTES:

sf = square feet; du = dwelling units

[a] Post-dedication square footage is calculated with the inclusion of the 1,312-square-foot East Site Alley Merger and the 5,163-square-foot sidewalk merger (along Yucca Street and both sides of Vine Street) area.

[b] The maximum building height includes the bulkhead on the West Building and East Building (a non-occupiable additional level, housing only mechanical equipment), as well as all architectural elements (i.e., screen element, elevator shafts, mechanical bulkheads, parapets).

[c] The FAR is calculated by the total buildable area (1,401,453 square feet) divided by the total Project Site lot area (200,971 square feet) = 6.973.

[d] As stated further below under Section 8, Anticipated Project Approvals, the Project is requesting a Conditional Use Permit pursuant to LAMC Section 12.24 W.19 for a unified development to allow FARFAR averaging and residential density transfer between the East Site and the West Site. This would allow for the Project to park more on one-site to meet the total vehicular parking requirements.

SOURCE: Handel Architects LLP, 2019 and James Corner Field Operations, 2019.

The Project would include up to 1,005 residential units (872 market-rate units and 133 senior affordable units), approximately 68,869 square feet of indoor residential amenities and lobbies, approximately 33,922 square feet of publicly accessible open space, approximately 30,176 square feet of restaurant/retail space, up to 1,521 vehicle parking spaces within a five-level subterranean parking garage with one level of enclosed at-grade parking, up to 551 bicycle parking spaces, and associated sidewalk and roadway (Vine Street) pedestrian improvements. The Project's parking would include the use of 296 mechanical double-stackers to provide 586 spaces, which would be operated by valet staff. LAMC Section 11.5.11 requires projects, which propose a minimum of 10 or more residential dwelling units in conjunction with a General Plan Amendment, Zone Change or Height District Change that results in increased allowable residential floor area, density or height, or allows a residential use where previously not allowed density, to set aside a minimum of 11 percent of the Project's total residential density for

affordable housing. With 133 affordable units, the Project would meet this requirement.

The Project would have a maximum FAR of 6.973:1,[12] which includes the existing approximately 114,303-square-foot Capitol Records Complex (consisting of the 92,664-square-foot Capitol Records Building and the 21,639-square-foot Gogerty Building). The maximum developable floor area for the Project Site would be 1,401,453 square feet. The Project is requesting a Conditional Use Permit pursuant to LAMC Section 12.24 W.19 for a unified development to allow FAR averaging and residential density transfer between the East Site and the West Site. As the East Site is larger than the West Site, the West Site would be the recipient of the proposed averaging of floor area and residential density. The West Site would utilize approximately 64,300 square feet of floor area from the East Site, which would permit an additional 97 to 98 units on the East Site.

The proposed building locations, open space areas, and vehicular access on the entire Project Site are presented in **Figure II-5**, *Conceptual Site Plan*.

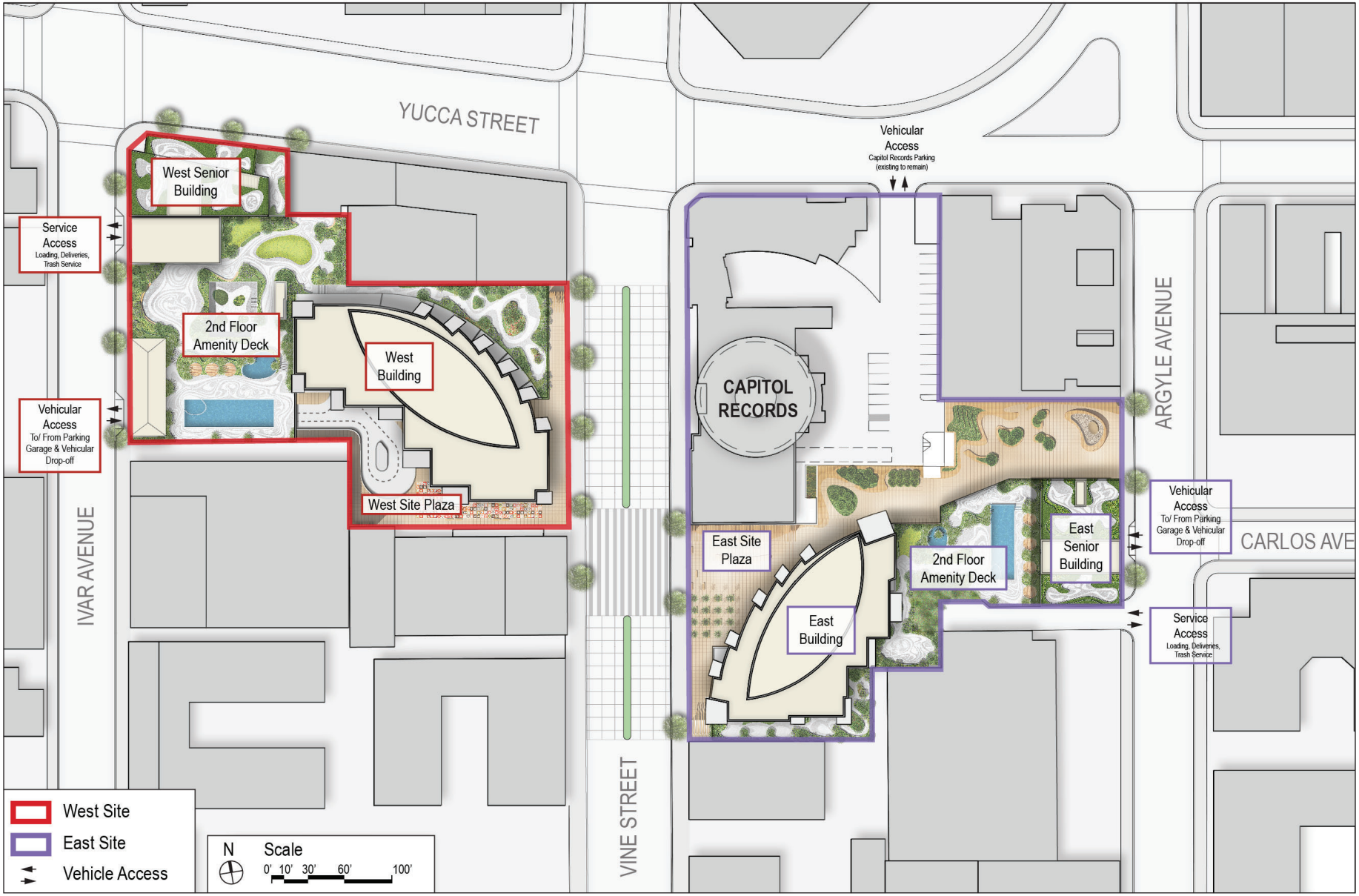
b) Development Program

(1) West Site

The 78,629-square-foot West Site would be developed with the 35-story West Building, with a maximum height of 469 feet; and the 11-story West Senior Building, with a maximum height of 155 feet. The West Site would include 597,236 square feet of residential floor area comprised of 517 residential units, 38,816 square feet of supporting residential amenities/lobbies/miscellaneous support spaces, and 12,691 square feet of retail/restaurant space. Examples of miscellaneous support spaces include, but are not limited to, security, storage, mailroom and a fire command room. In total, the West Site would be developed with a maximum of 648,743 square feet. A more detailed depiction of the West Site is provided in **Figure II-6**, *Conceptual Plot Plan, West Site*, and elevations of the proposed buildings are depicted in **Figure II-7***, Building Sections, West Site*.

The West Site would provide up to 8,932 square feet of publicly accessible, ground floor open space. As shown in **Figure II-16**, *Publicly Accessible Open Space*, below, this includes the several distinctive outdoor areas comprised of the West Site Plaza (West Plaza), which would contain outdoor seating areas and a paseo (promenade or walkway) where visitors can view the Capitol Records Building.

[12] With the removal of the D Limitation, the maximum permitted FAR for the Project Site would be 6.0:1. By setting aside at least 11 percent of the total residential units for Extremely Low and/or Very Low Income households, the Project would be eligible for an 8.1:1 FAR. The Applicant requests up to 7.0:1 FAR.



SOURCE: Handel Architects, 2019

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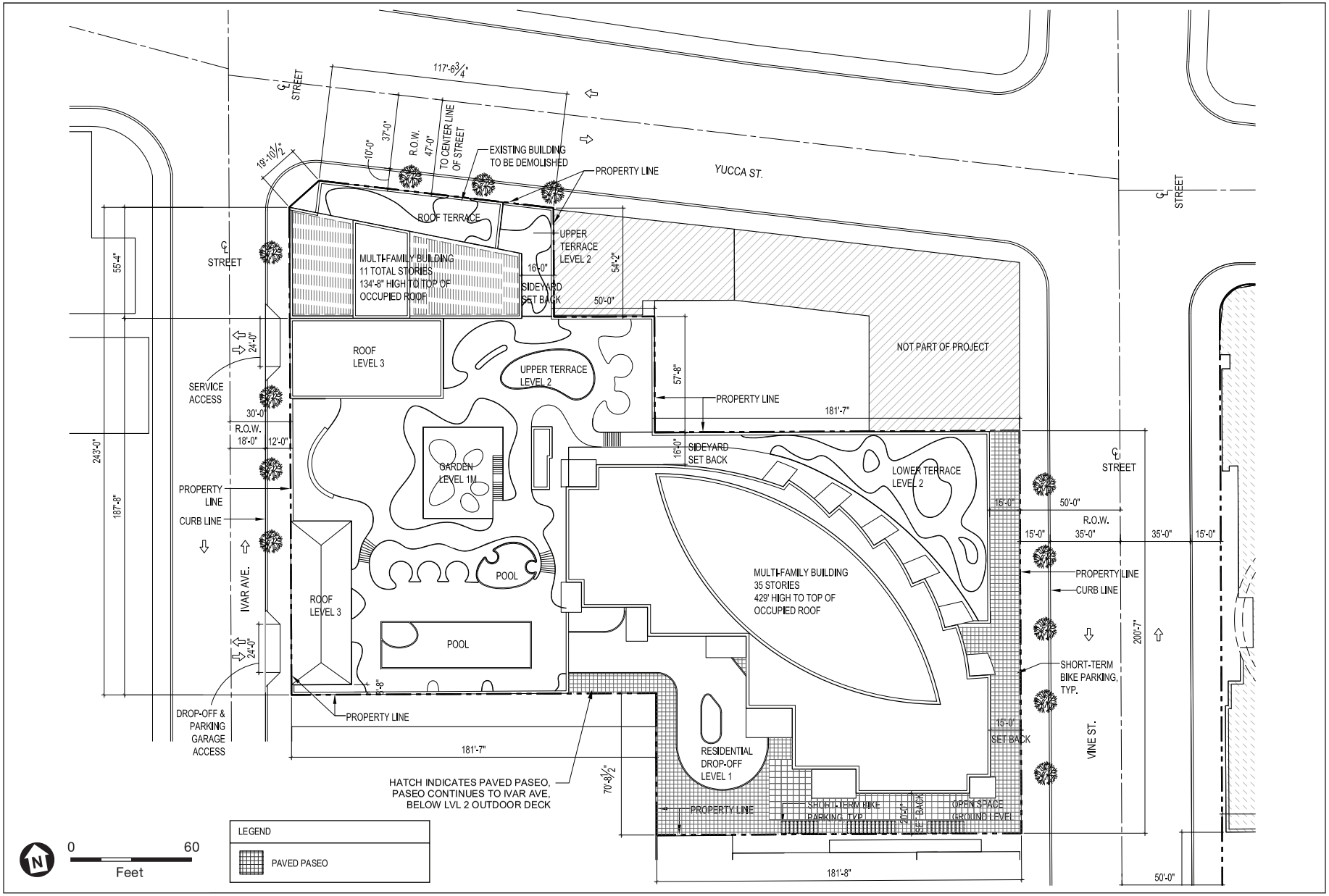
Figure II-5
Conceptual Site Plan



SOURCE: Handel Architects, 2018

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Figure II-6
Conceptual Plot Plan, West Site

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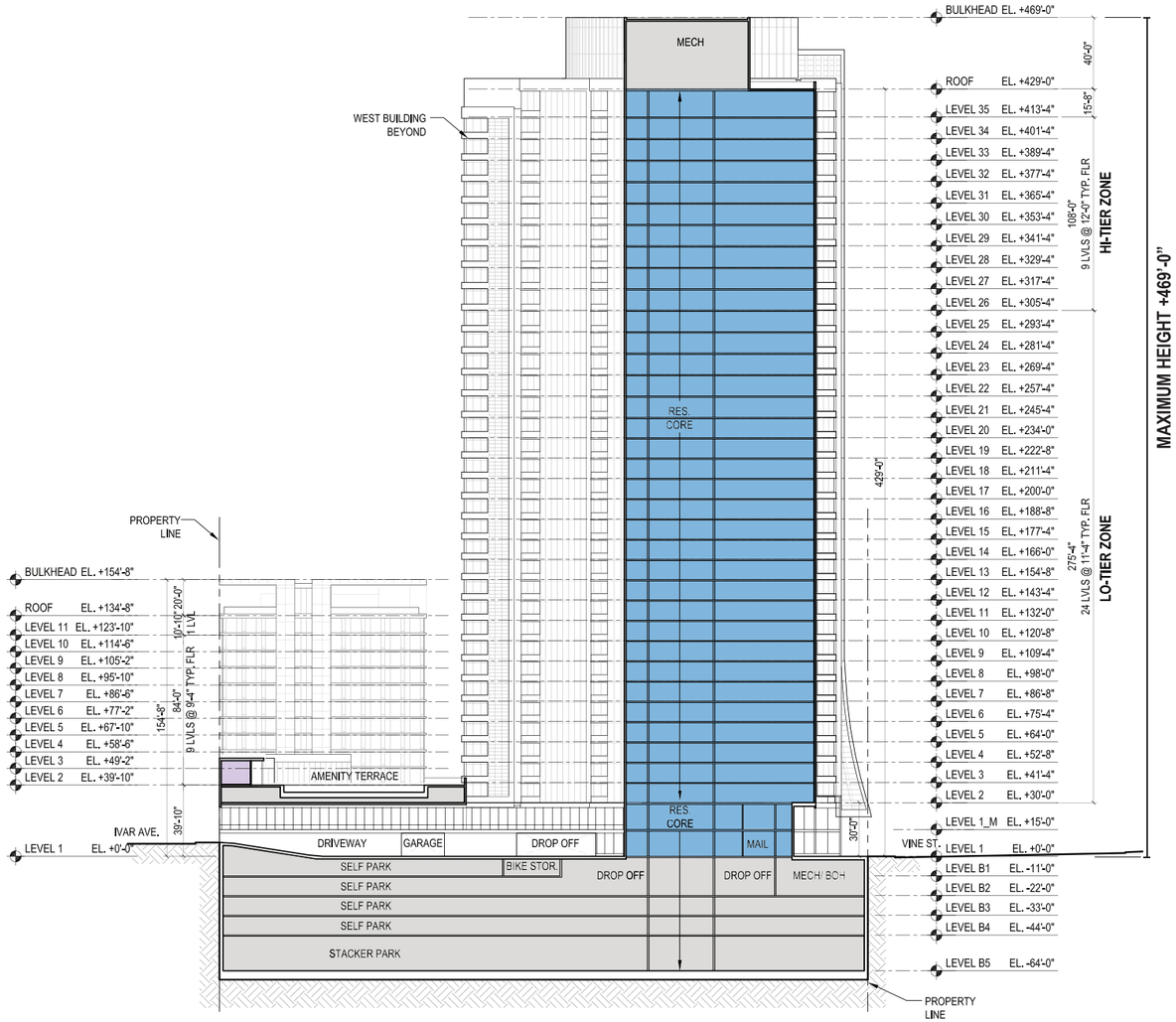
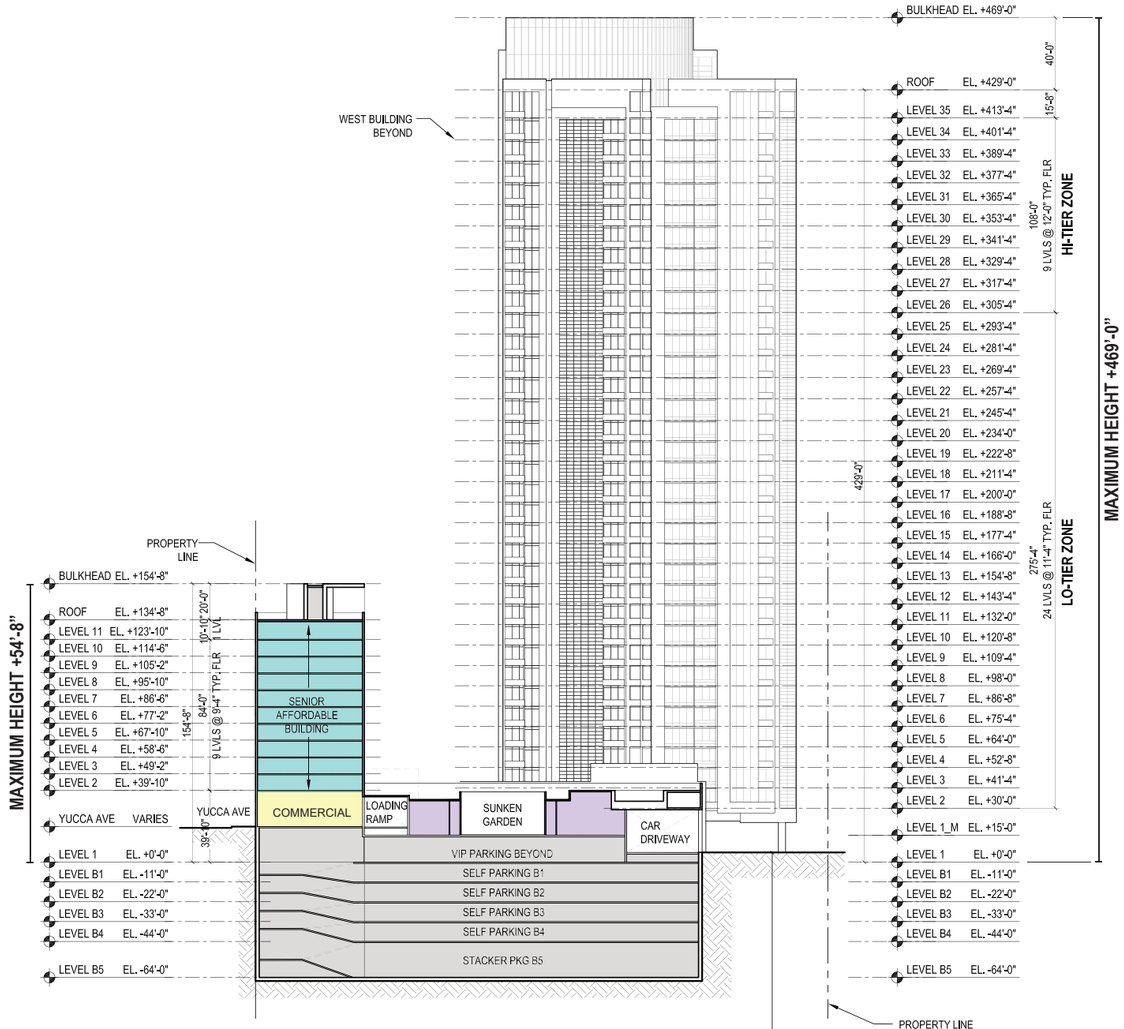


East - West



North - South

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SOURCE: Handel Architects, 2020

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Figure II-7
Building Sections, West Site

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The West Site's parking garage would provide up to 837 vehicle parking spaces and 277 bicycle parking spaces beneath both the West Building and the West Senior Building, and would be accessed via a second separate driveway along Ivar Avenue to access loading areas and trash receptacles. All trash pickup areas would be in enclosed interior areas.

The parking garage would be comprised of five subterranean levels as well as one additional level of enclosed at-grade parking.

Details regarding the elements of the West Site are described below.

(a) West Building

The 35-story West Building would contain 449 market-rate housing units on Levels 2 through 35, totaling approximately 534,947 square feet of residential floor area, and be comprised of the following unit mix:

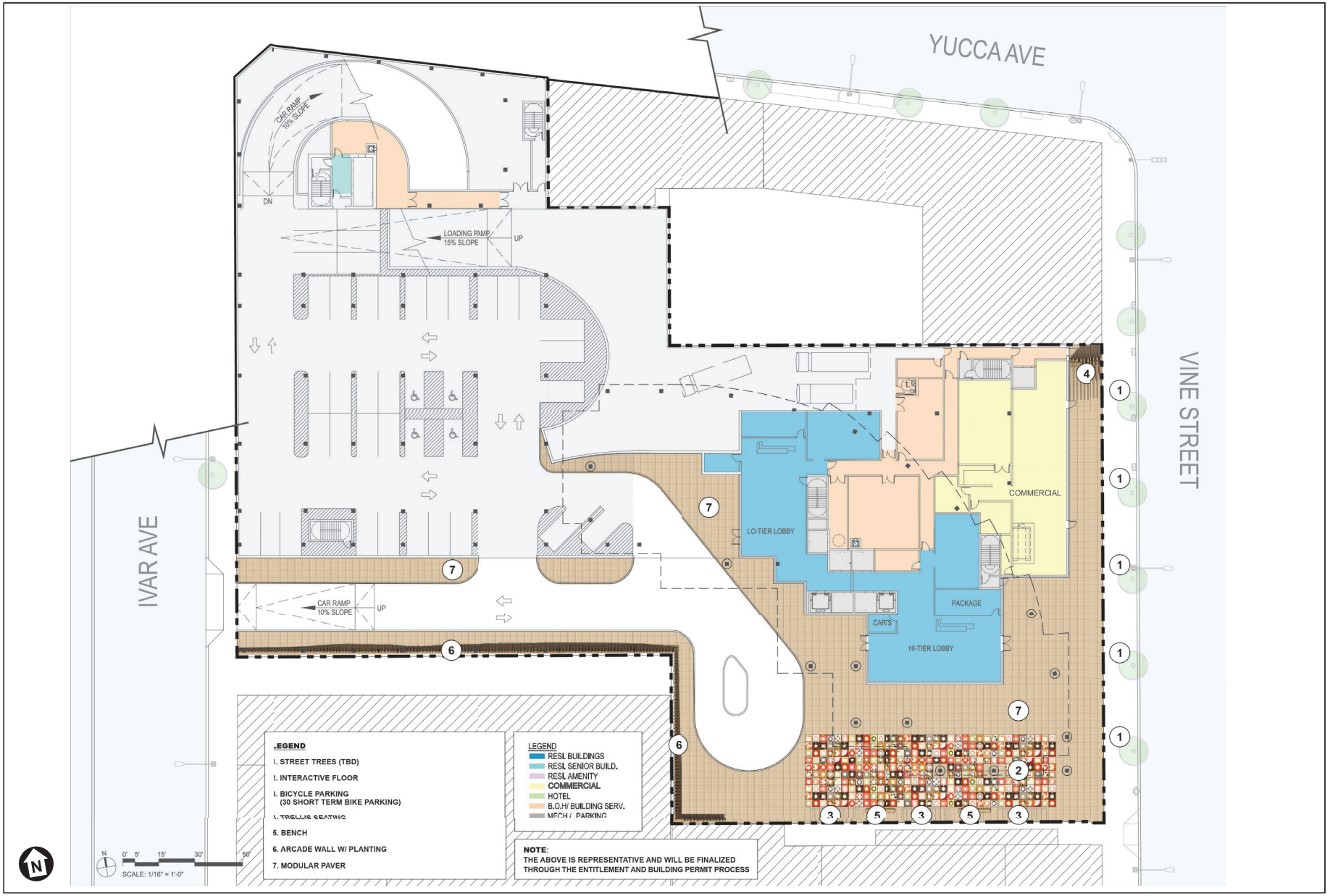
- 195 one-bedroom units
- 198 two-bedroom units
- 51 three-bedroom units
- 5 three-bedroom penthouse units

The main residential lobby and entrance to the West Building is comprised of a ground floor an mezzanine area. **Figure II-8**, *Level 1 Plan (Vine Street), West Site*, illustrates the Level 1 features, which are primarily accessed from Vine Street. **Figure II-9**, *Level 1 Mezzanine Plan (Yucca Street/Ivar Avenue), West Site*, illustrates the Level 1 mezzanine features, which are primarily accessed from Yucca Street and Ivar Avenue.

The West Building would contain a non-occupiable floor housing only mechanical equipment above Level 35, resulting in a total building height of 469 feet above grade.

The West Building would contain a total of 35,001 square feet of residential amenities, lobbies, and associated miscellaneous support spaces. Of this total, the West Building would contain 20,239 square feet of lobbies and related miscellaneous support spaces. Examples of miscellaneous support spaces include, but are not limited to, security, storage, mailroom and a fire command room. In addition, the West Building would contain 14,762 square feet of residential amenities on the mezzanine and Level 2, including the following approximate square footages:

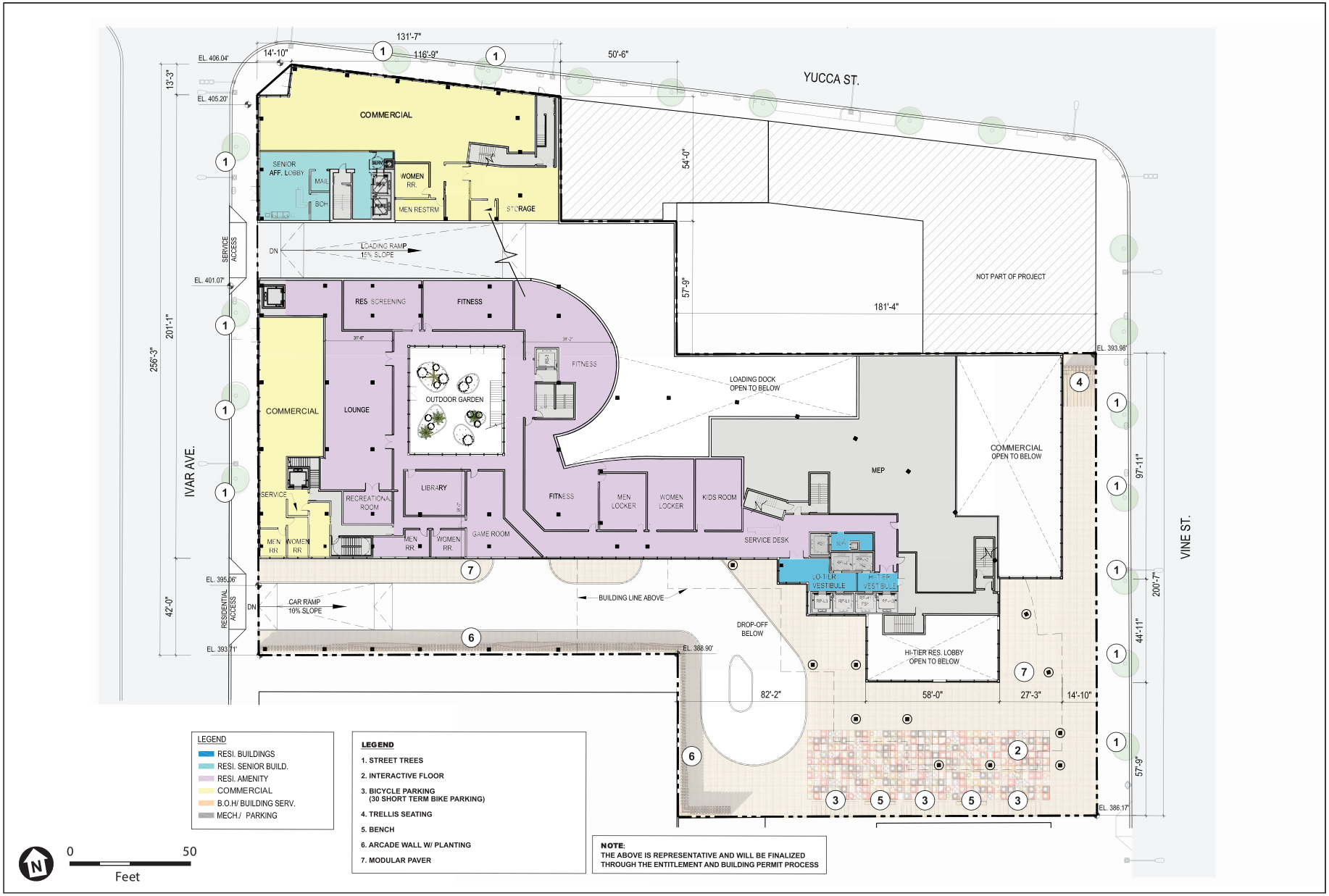
- 702-square-foot residential screening room
- 3,603-square-foot fitness area



SOURCE: Handel Architects, 2020

Hollywood Center Project

Figure II-8
Level 1 Plan (Vine Street), West Site



SOURCE: Handel Architects, 2020

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Figure II-9

Level 1 Mezzanine Plan (Yucca Street/Ivar Avenue), West Site

- 1,179-square-foot locker room
- 604-square-foot children's room (Kids Room)
- 716-square-foot game room
- 2,467-square-foot residential multi-purpose room
- 2,164-square-foot poolside clubhouse
- 292-square-foot recreation room
- 488-square-foot library
- 2,547-square-foot lounge space

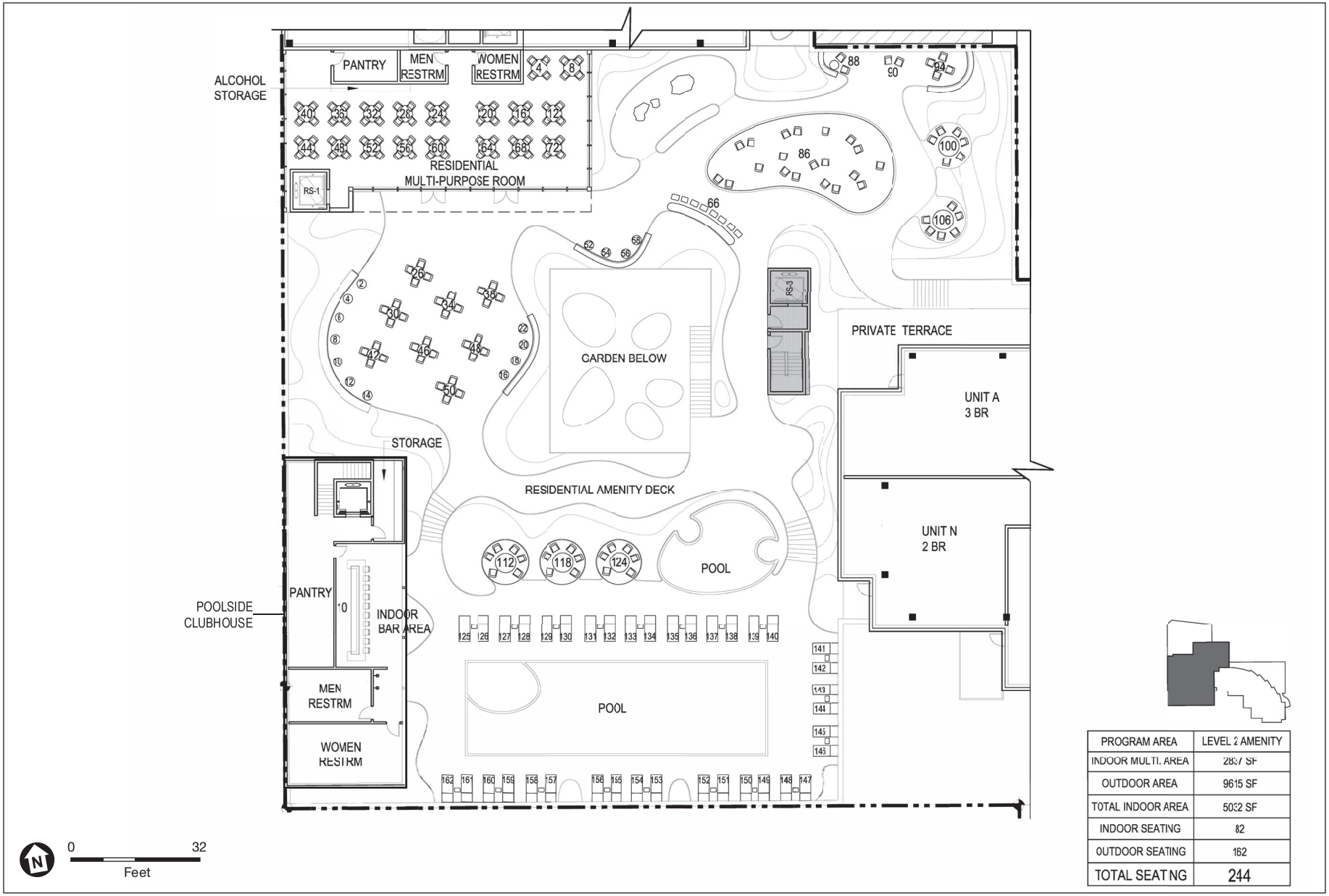
Residential common outdoor open space would include a poolside clubhouse, two pools, and an amenity deck with seating on Level 2. **Figure II-10**, *Amenity Deck (Level 2), West Site*, shows the amenity features provided on the Level 2 deck of the West Building.

The West Building would contain approximately 6,750 square feet of commercial floor area, consisting of approximately 3,810 square feet of retail or restaurant space on the ground floor along Vine Street, and approximately 2,940 square feet of retail or restaurant space on the mezzanine level along which would be at-grade along Ivar Avenue.

(a) West Senior Building

The 11-story West Senior Building would contain 68 senior affordable housing units, set aside for Extremely Low and/or Very Low Income households, on Levels 2 through 11, comprised of 59 one-bedroom units and nine two-bedroom units, totaling approximately 62,289 square feet of residential floor area. The 1,920-square-foot ground floor lobby would front Ivar Avenue, and contain two elevators accessible from the subterranean garage, a mail room, and a back of house (BOH) service area. As shown in **Figure II-11**, *Senior Affordable Housing Amenities, West Site*, Level 2 would contain a multi-purpose room and senior support services office measuring 1,895 square feet, and a 1,080-square-foot senior residents' outdoor amenity terrace. The multi-purpose room would be used for group activities, such as fitness, games, and entertainment; and the senior support services office could be used by social workers to provide a wide array of assistance to the senior residents. The rooftop would contain an approximately 4,935-square-footopen-air terrace that could also be used for a variety of activities, gatherings, and other programs.

The West Senior Building would contain approximately 5,941 square feet of retail or restaurant space on the mezzanine level fronting on Yucca Street.



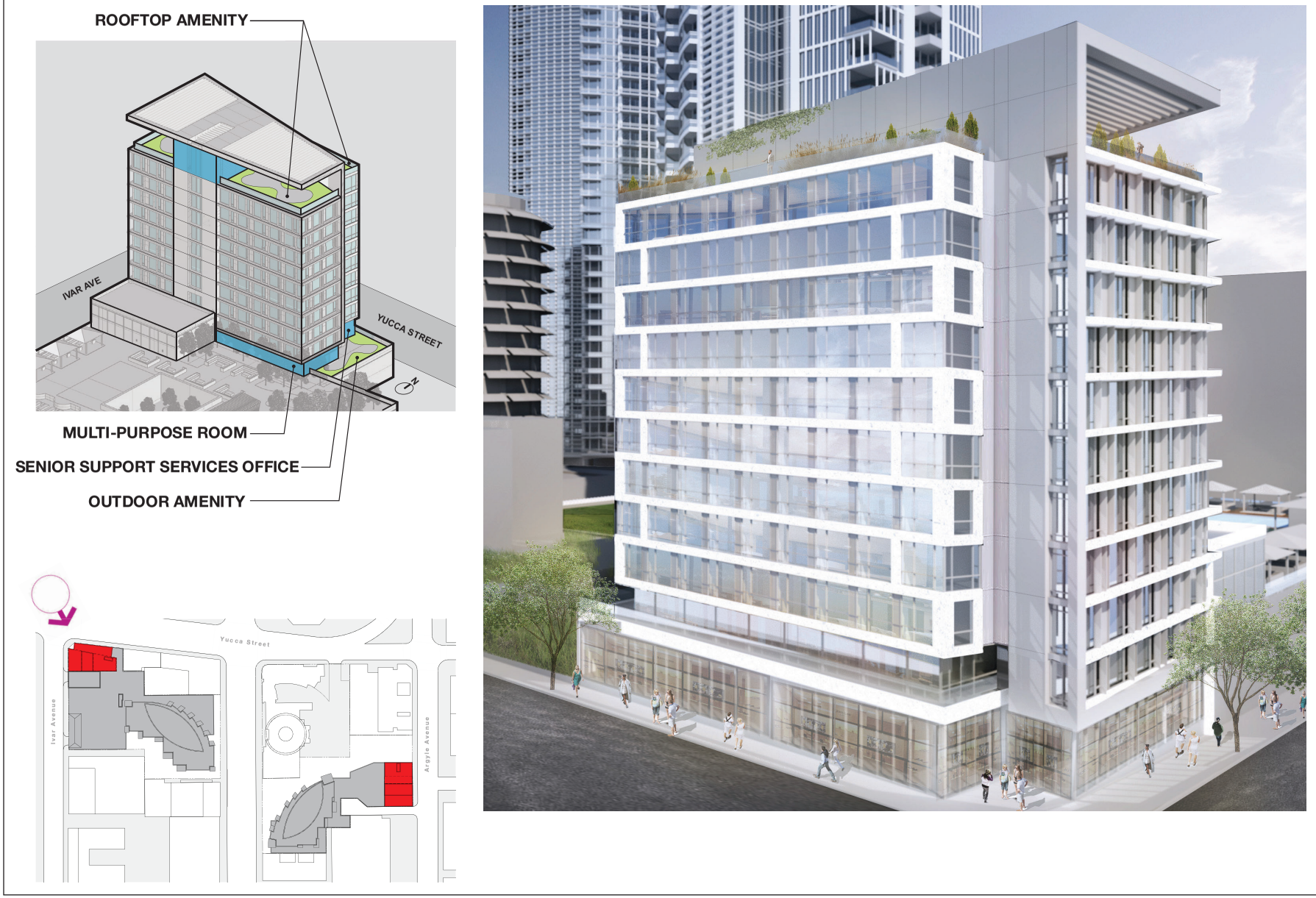
PROGRAM AREA	LEVEL 2 AMENITY
INDOOR MULTI. AREA	2837 SF
OUTDOOR AREA	9615 SF
TOTAL INDOOR AREA	5032 SF
INDOOR SEATING	82
OUTDOOR SEATING	162
TOTAL SEATING	244

D170105.00

SOURCE: Handel Architects, 2018

Hollywood Center Project

Figure II-10
Amenity Deck (Level 2), West Site



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SOURCE: Handel Architects, 2018

Hollywood Center Project

Figure II-11
Senior Affordable Housing Amenities, West Site

(2) East Site

The 115,866-square-foot East Site would preserve the existing Capitol Records Complex and include development of the 46-story East Building, with a maximum height of 595 feet; and the 11-story East Senior Building, with a maximum height of 150 feet. The East Site would include 590,869 square feet of residential floor area, comprised of 488 residential units; 30,053 square feet supporting residential amenities/lobbies/miscellaneous support space; and 17,485 square feet of retail/restaurant space. Examples of miscellaneous support spaces include, but are not limited to, security, storage, mailroom and a fire command room. In total, the East Site would be developed with a maximum of 638,407 square feet. A more detailed depiction of the East Site is provided in **Figure II-12**, *Conceptual Plot Plan, East Site*, and elevations of the proposed buildings are depicted in **Figure II-13***, Building Sections, East Site*. **Figure II-14**, *Level 1 Plan (Vine Street), East Site*, illustrates the Project's Level 1 features, which are primarily accessed from Vine Street. **Figure II-15**, *Level 1 Mezzanine Plan (Argyle Avenue), East Site*, illustrates the Project's Level 1 mezzanine features, which are primarily accessed from Argyle Avenue.

The East Site would provide up to 24,990 square feet of publicly accessible, ground floor open space. As shown in **Figure II-16**, *Publicly Accessible Open Space*, this includes the several distinctive outdoor areas comprised of the East Site Plaza (East Plaza), where visitors can view the Capitol Records Building or participate in a variety of proposed programs, such as public performances, art installations and special events. These areas are further described under Subsection 7.d, *Open Space, Landscaping, and Public Art*, below.

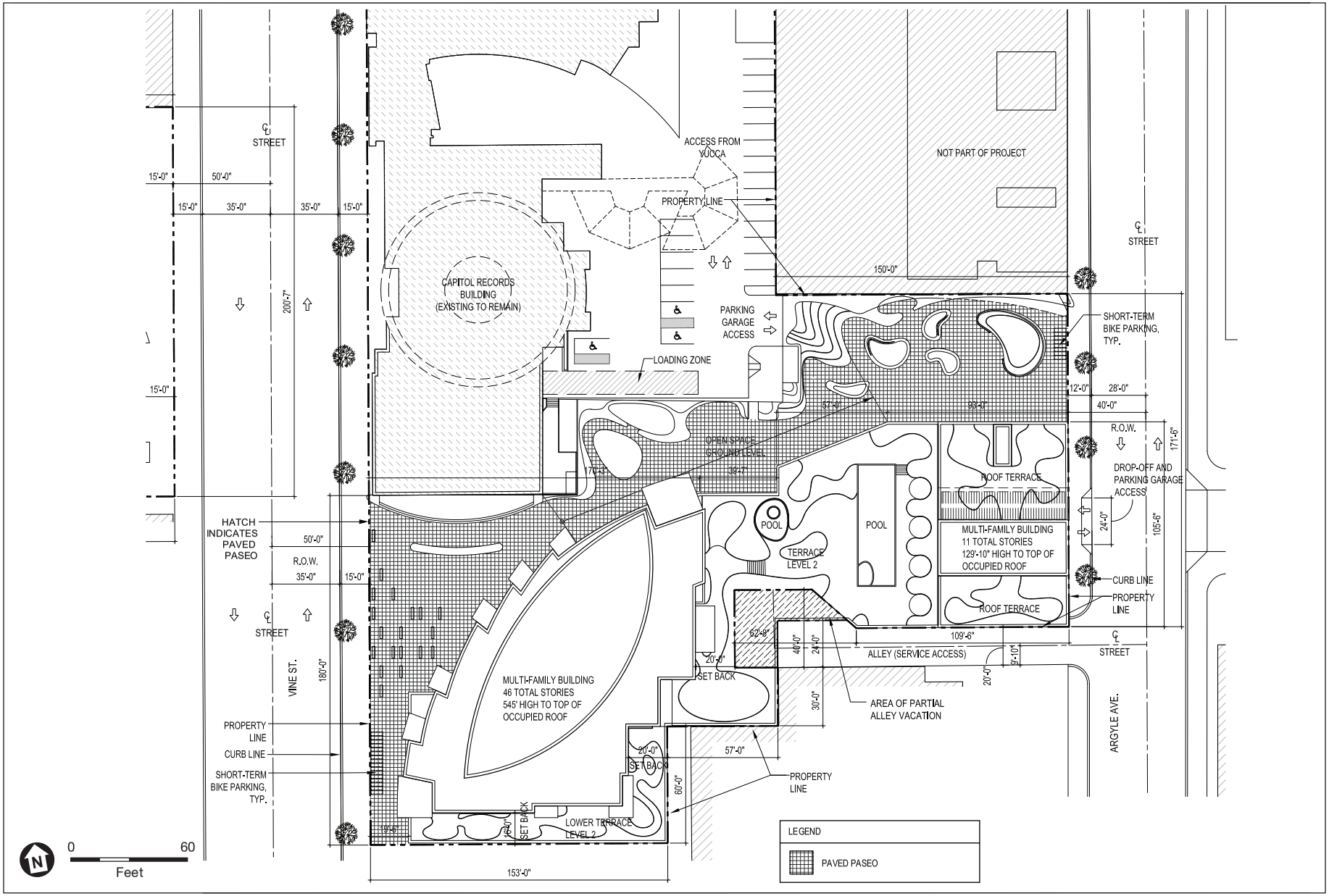
The East Site's parking garage would provide up to 684 vehicle parking spaces and 274 bicycle parking spaces beneath both the East Building and the East Senior Building, and would be accessed directly from the north driveway Argyle Avenue. The loading areas and trash receptacles, which would be enclosed within a covered loading bay screened by a roll down door, would be accessed from the south driveway on Argyle. The existing Yucca Street driveway, located between Vine Street and Argyle Avenue, would remain and provide dedicated access to the Capitol Records Complex.

Details regarding the elements of the East Site are described below.

(a) East Building

The 46-story East Building would contain 423 market-rate housing units on Levels 3 through 46, totaling approximately 529,092 square feet of residential floor area, and comprised of the following unit mix:

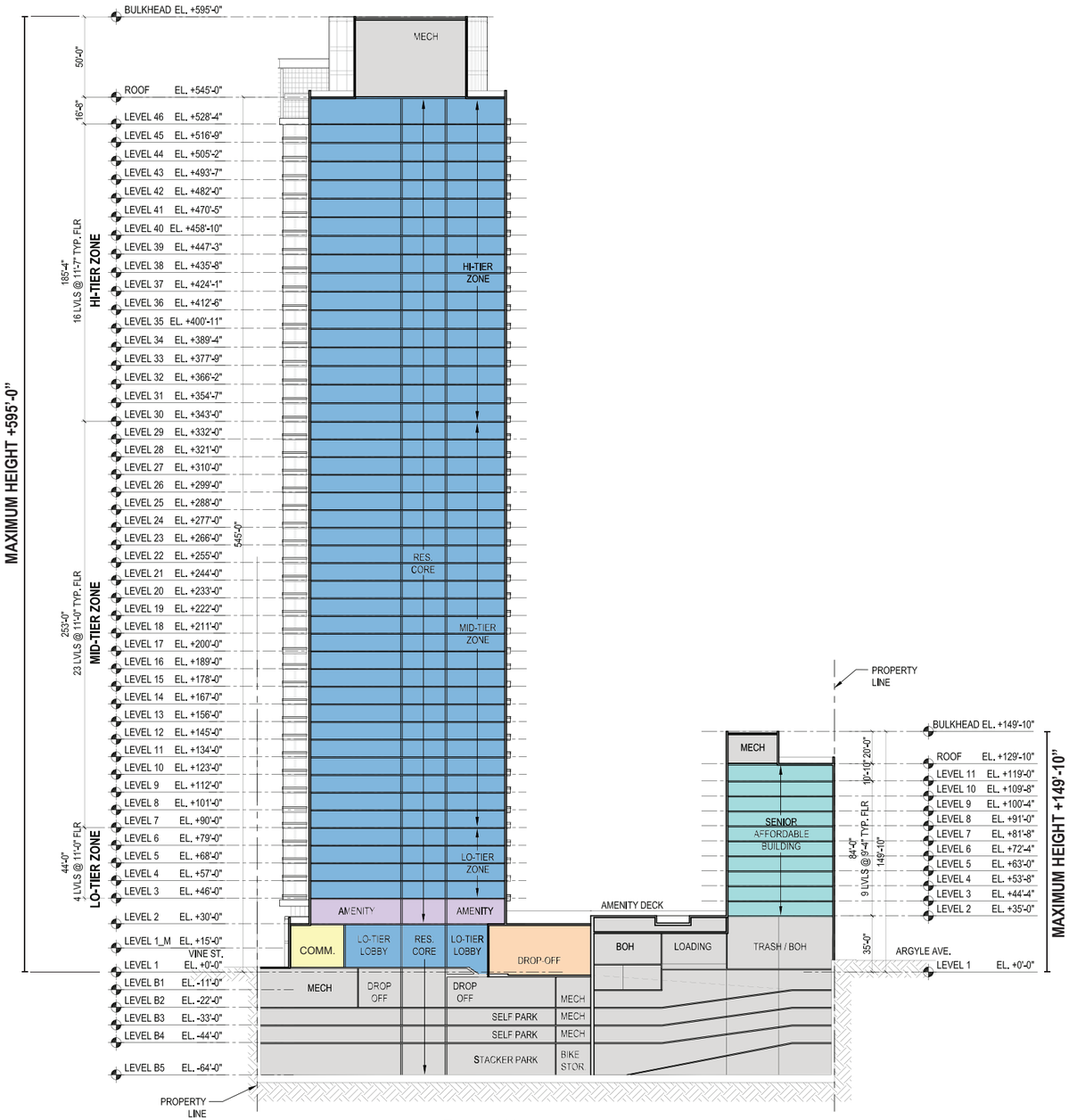
- 175 one-bedroom units
- 172 two-bedroom units
- 71 three-bedroom units
- 5 three-bedroom penthouse units



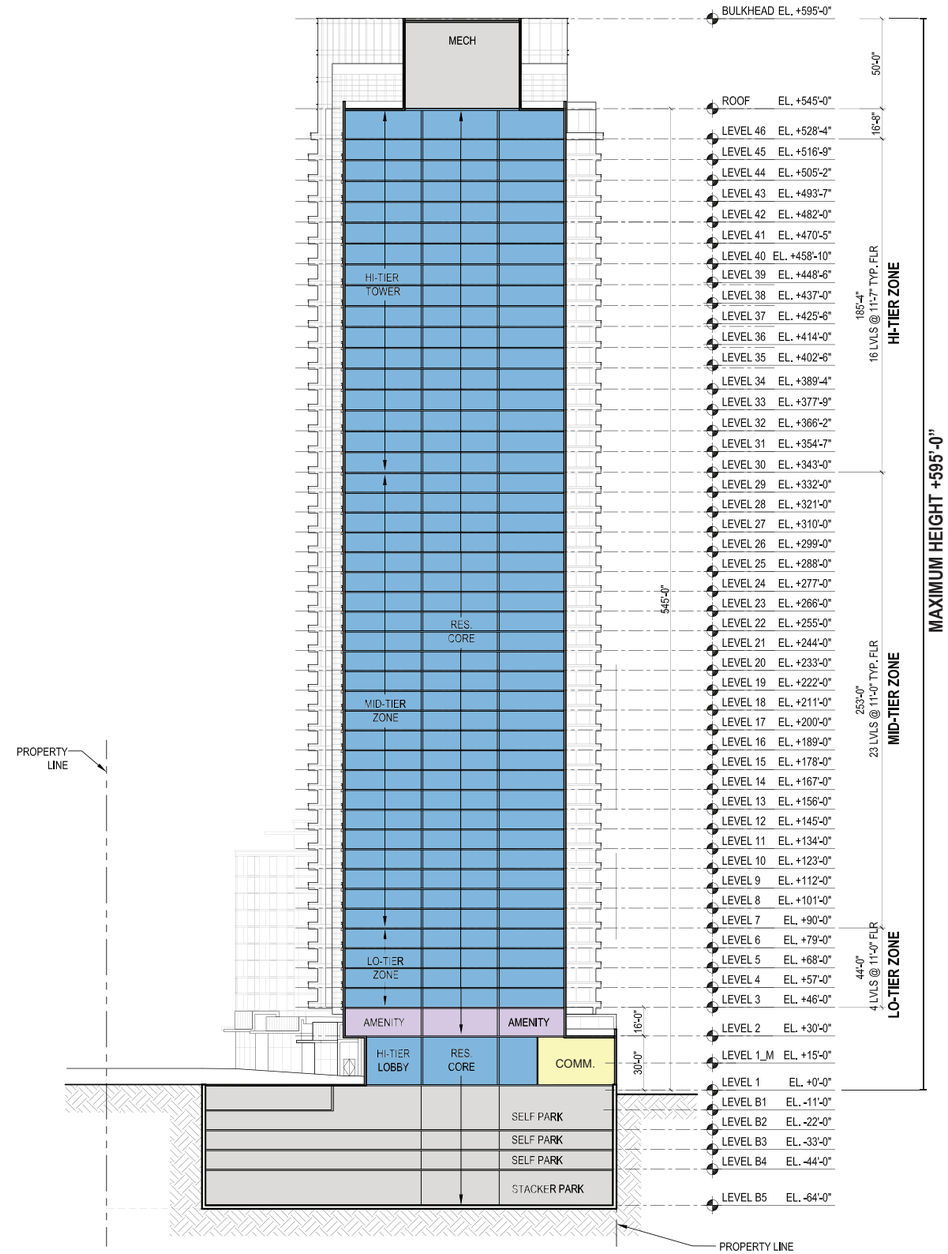
SOURCE: Handel Architects, 2019

Hollywood Center Project

Figure II-12
Conceptual Plot Plan, East Site



East - West



North - South

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SOURCE: Handel Architects, 2020

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Figure II-13
Building Sections, East Site

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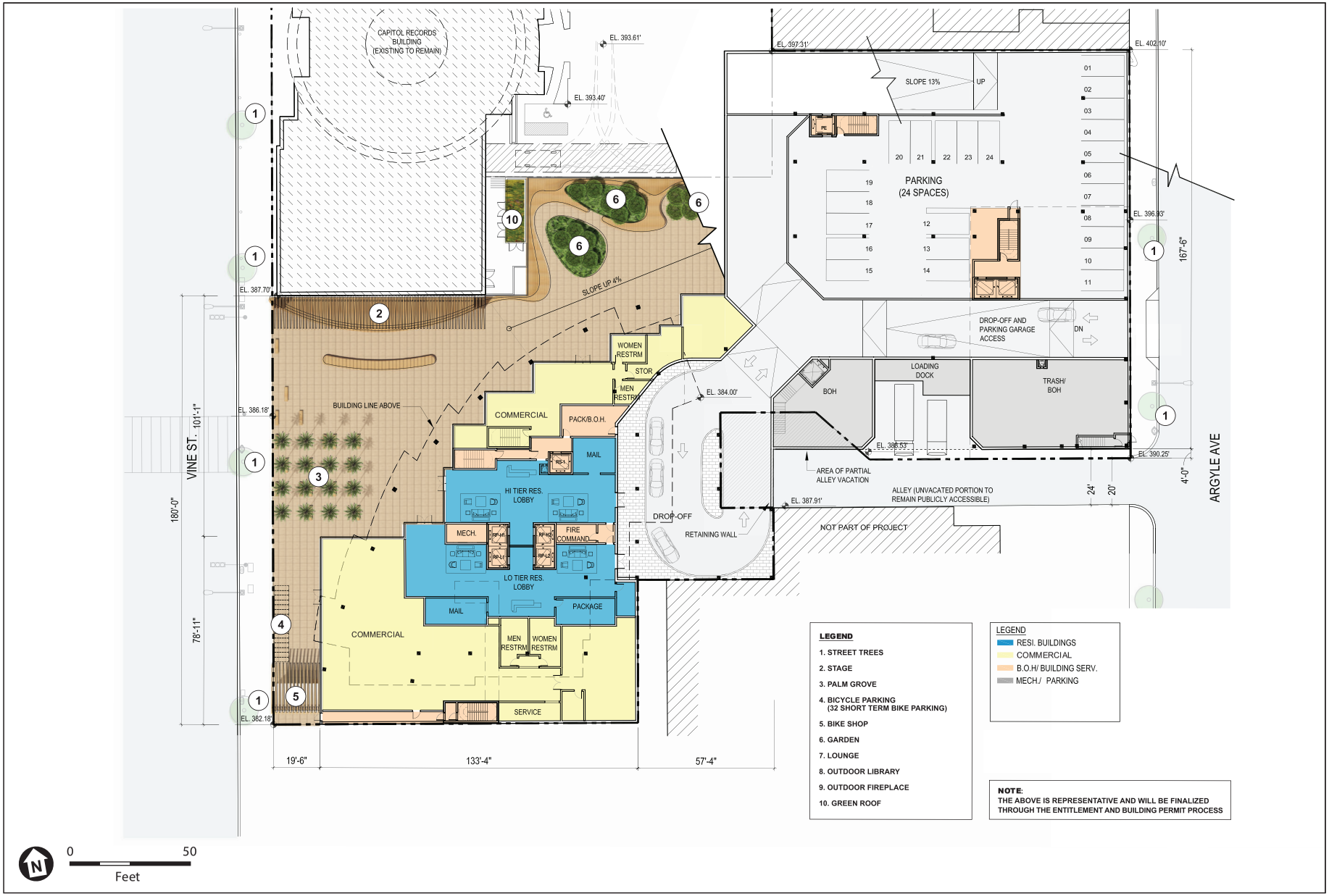

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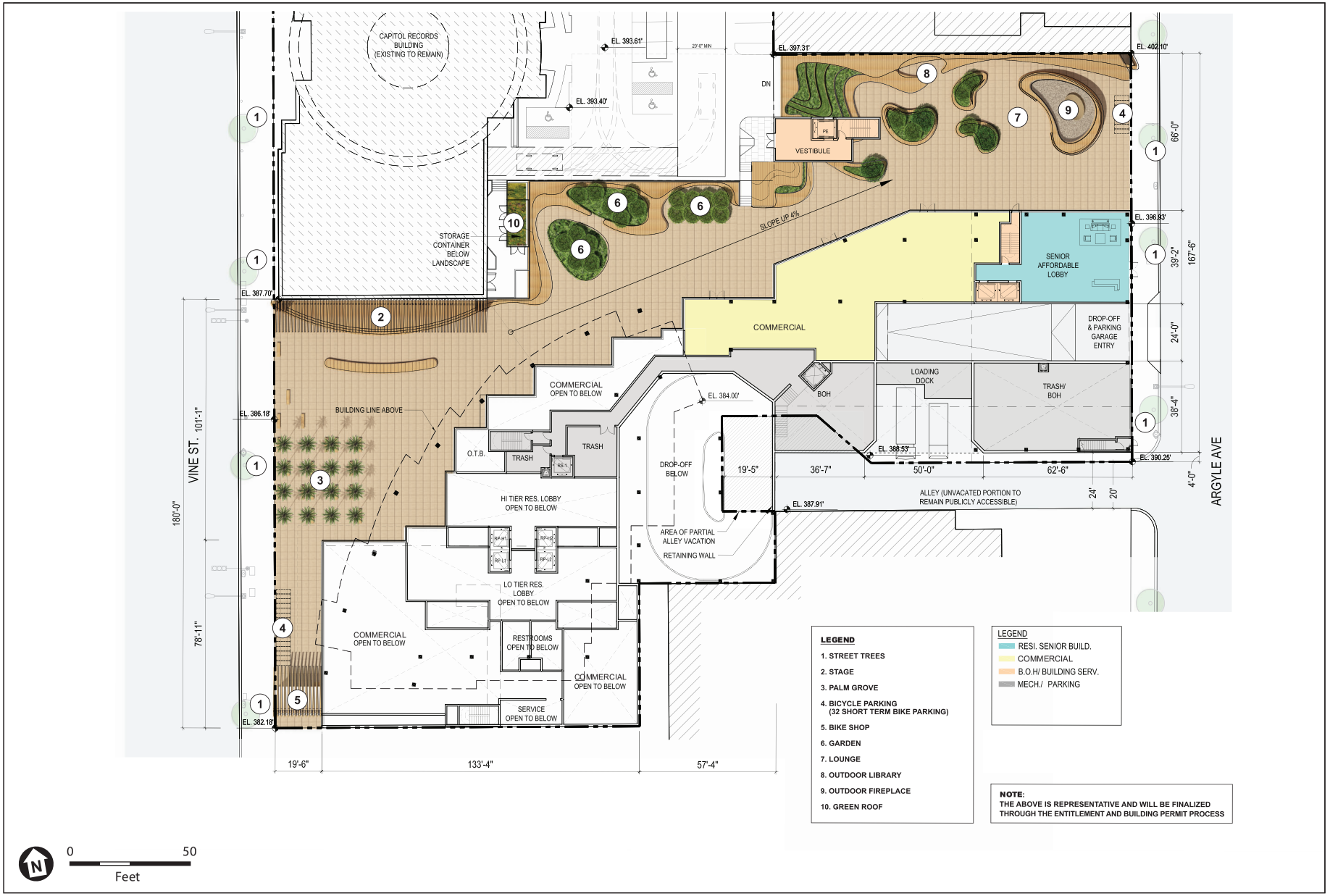
SOURCE: Handel Architects, 2020

Hollywood Center Project

Figure II-14
Level 1 Plan (Vine Street), East Site



D170105.00

SOURCE: Handel Architects, 2020

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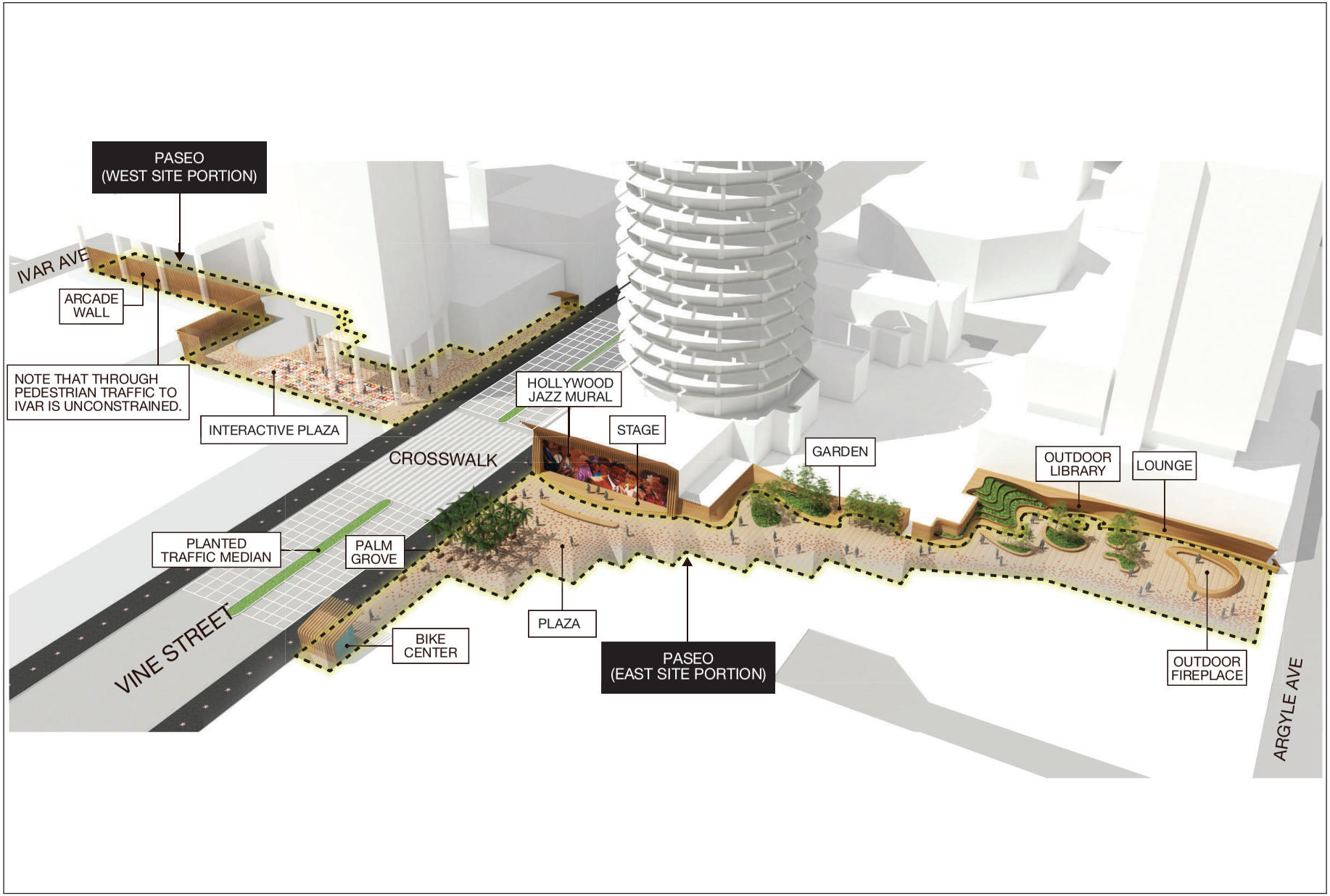
Figure II-15
Level 1 Mezzanine Plan (Argyle Avenue), East Site



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SOURCE: Handel Architects, 2019

Hollywood Center Project

Figure II-16
Publicly Accessible Open Space

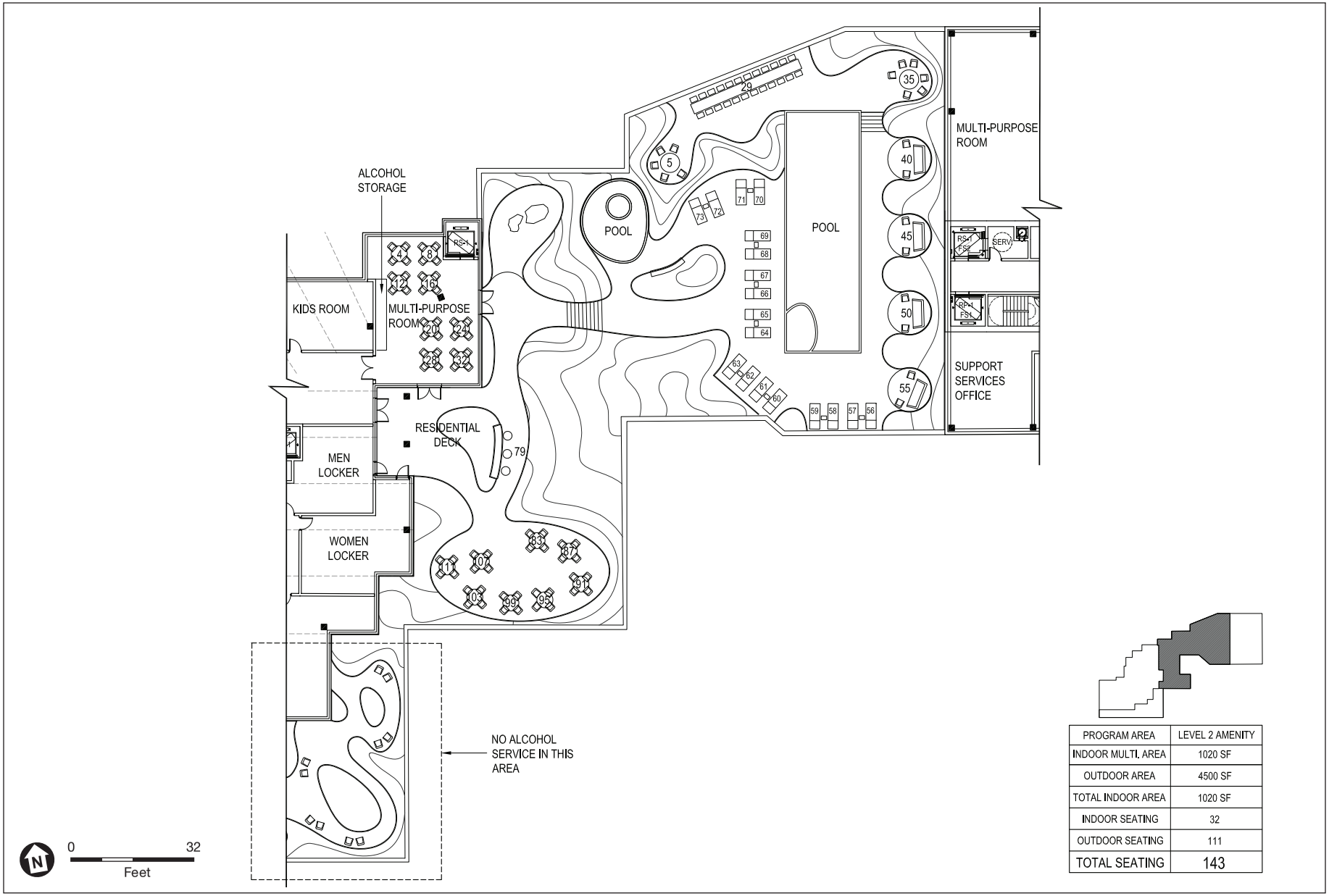
The East Building would contain a non-occupiable floor housing mechanical equipment only above Level 46, resulting in a total building height of 595 feet above grade. The East Building would contain a total of 26,178 square feet of residential amenities, lobbies, and associated miscellaneous support spaces. Of this total, the East Building would contain 15,910 square feet of lobbies and related miscellaneous support spaces. Examples of miscellaneous support spaces include, but are not limited to, security, storage, mailroom and a fire command room. In addition, the East Building would contain 10,268 square feet of residential amenities on the mezzanine and Level 2, including the following approximate square footages:

- 3,475-square-foot lounge space
- 602-square-foot residential screening room
- 2,171-square-foot fitness area
- 1,144-square-foot locker room
- 1,271-square-foot residential multi-purpose room
- 588-square-foot childrens room (Kids Room)
- 616-square-foot recreation room
- 401-square-foot library

Residential common outdoor open space would include two pools and an amenity deck with seating on Level 2. **Figure II-17,** *Amenity Deck (Level 2), East Site*, shows the amenity features provided.

The East Building would contain approximately 7,580 square feet of commercial floor area, consisting of approximately 5,912 square feet of retail or restaurant space on the ground level along Vine Street, and 1,668 square feet of retail or restaurant space on the ground level fronting on the paseo.

Pursuant to a lease between the Applicant and Capitol Records that can be extended until 2026, Capitol Records must consent to certain proposed improvements that may impact their use of the property (Capitol Records Lot Scenario). Specifically, Capitol Records must grant its consent to portions of the proposed open space area on the East Site. Depending upon negotiations on use of the space, the East Site's open space area may be reduced by up to 5,995 square feet and redesigned to accommodate Capitol Records and/or to comply with the lease. See Subsection 7.d, *Open Space, Landscaping, and Public Art*, below, for more detail. In the event that Capitol Records does not consent to the proposed open space area, the ground floor restaurant/retail space in the mezzanine floor along Argyle Avenue would be reduced by 1,800 square feet (from 7,580 square feet to 5,780 square feet) in order to maintain a minimum of 20 feet pedestrian circulation width through the paseo in the East Site near the Capitol Records lot. Of this 1,800 square foot area, approximately 1,480 square feet would qualify as open space.



PROGRAM AREA	LEVEL 2 AMENITY
INDOOR MULTI. AREA	1020 SF
OUTDOOR AREA	4500 SF
TOTAL INDOOR AREA	1020 SF
INDOOR SEATING	32
OUTDOOR SEATING	111
TOTAL SEATING	143

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SOURCE: Handel Architects, 2019

Hollywood Center Project

Figure II-17
Amenity Deck (Level 2), East Site

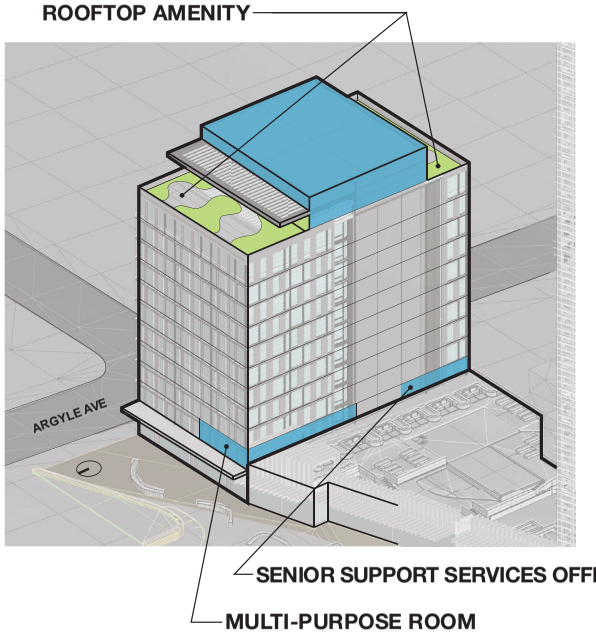
(b) East Senior Building

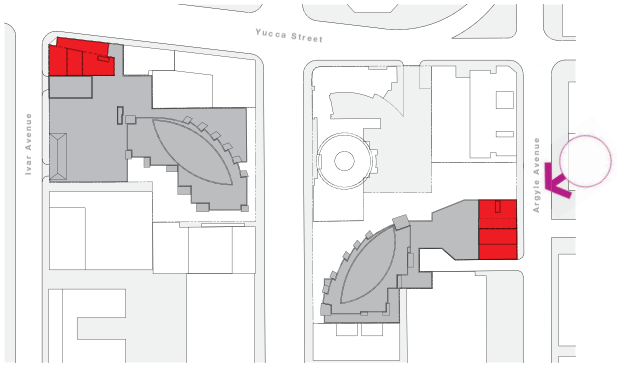
The 11-story East Senior Building would contain 65 senior affordable housing units, set aside for Extremely Low and/or Very Low Income households, on Levels 2 through 11, comprised of 53 one-bedroom units and 12 two-bedroom units, totaling approximately 61,777 square feet of residential floor area. The 1,874-square-foot ground floor lobby would front Argyle Avenue and contain two elevators accessible from the subterranean garage, a mail room, and BOH service area. As shown in **Figure II-18**, *Senior Affordable Housing Amenities, East Site*, Level 2 would contain a multi-purpose room and a senior support services office measuring 2,000 square feet. The multi-purpose room would be used for group activities, such as but not limited to fitness, games, and entertainment, and the senior support services office could be used by social workers to provide a wide array of assistance to the senior residents. The rooftop would contain a 4,800-square-foot open-air terrace that would be used for a variety of activities, gatherings, and other programs.

The East Senior Building would contain approximately 9,905 square feet of retail or restaurant space on the ground level fronting on the paseo.

(3) Project with the East Site Hotel Option

No changes would occur to the West Site under the Project with the East Site Hotel Option, as described above. The proposed development program for the Hotel Option is summarized in **Table II-2**, *Proposed Development Program for the Project with the East Site Hotel Option*. The Project with the East Site Hotel Option would have a maximum FAR of 6.901:1 (up to a maximum of 7:1, see Anticipated Project Approvals below), which includes the existing Capitol Records Complex, for a total buildable area for the Project Site of 1,387,044 square feet. Under the Project with the East Site Hotel Option, the East Building uses and the East Senior Building and associated uses would be modified as detailed below. **Figure II-19**, *Conceptual Site Plan – Project With the East Site Hotel Option*, illustrates the Site Plan for the Project with the East Site Hotel Option. As discussed below, the difference compared to the Site Plan shown in Figure II-5 is within the East Site Level 2 amenity deck. A more detailed depiction of the East Site is provided in **Figure II-20**, *Conceptual Plot Plan, East Site – Project With the East Site Hotel Option*. **Figure II-21**, *Level 1 Plan (Vine Street), East Site – Project With the East Site Hotel Option*, illustrates the Project with the East Site Hotel Option's Level 1 features, which are primarily accessed from Vine Street. **Figure II-22**, *Level 1 Mezzanine Plan (Argyle Avenue), East Site – Project With the East Site Hotel Option*, illustrates the Project with the East Site Hotel Option's Level 1 mezzanine features, which are primarily accessed from Argyle Avenue.





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SOURCE: Handel Architects, 2019

Hollywood Center Project

Figure II-18
Senior Affordable Housing Amenities, East Site

TABLE II-2
PROPOSED DEVELOPMENT PROGRAM FOR THE PROJECT WITH THE EAST SITE HOTEL OPTION

	West Site	East Site Hotel Option	Total (Across Project Site)
Site Area (Pre-Dedication)	78,629 sf	115,866 sf	194,495 sf (4.46 acres)
Site Area (Post-Dedication)[a]	83,792 sf	117,179 sf	200,971 sf (4.61 acres)
Maximum Building Height[b]	469 feet	595 feet	595 feet
Residential			
Market-Rate Units			
One-Bedroom	195 du	117 du	312 du
Two-Bedroom	198 du	132 du	330 du
Three-Bedroom	56 du	70 du	126 du
Subtotal Market-Rate Units	*449 du*	*319 du*	*768 du*
Subtotal Market-Rate Residential Floor Area	*534,947 sf*	*408,572 sf*	*943,519 sf*
Senior Affordable Units			
One-Bedroom	59 du	40 du	99 du
Two-Bedroom	9 du	8 du	17 du
Subtotal Senior Affordable Units	*68 du*	*48 du*	*116 du*
Subtotal Senior Affordable Residential Floor Area	*62,289 sf*	*47,746 sf*	*110,035 sf*
Indoor Residential Amenities and Lobbies			
Market-Rate Residential	35,001 sf	16,420 sf	51,421 sf
Senior Affordable Residential	3,815 sf	3,497 sf	7,312 sf
Subtotal Indoor Residential Amenities and Lobbies Floor Area	*38,816 sf*	*19,917 sf*	*58,733 sf*
Commercial			
Restaurant/Retail	12,691 sf	17,485 sf	30,176 sf
Hotel		130,278 sf	130,278 sf
Subtotal Commercial floor Area	*12,691 sf*	*147,763 sf*	*160,454 sf*
Total Floor Area	***648,744 sf***	***623,997 sf***	***1,272,741 sf***
Total Buildable Area for Floor Area Ratio			*1,387,044 sf*
Floor Area Ratio			**6.901:1**[c]

TABLE II-2
PROPOSED DEVELOPMENT PROGRAM FOR THE PROJECT WITH THE EAST SITE HOTEL OPTION

	West Site	East Site Hotel Option	Total (Across Project Site)
Parking			
Vehicular Parking[d]			
Required	663 spaces	809 spaces	1,472 spaces
Proposed	837 spaces	684 spaces	1,521 spaces
Bicycle Parking			
Long-Term	247 spaces	226 spaces	473 spaces
Short-Term	30 spaces	51 spaces	81 spaces
Subtotal Bike Parking Spaces	*277 spaces*	*277 spaces*	*554 spaces*
Open Space			
Publicly Accessible Open Space	8,932 sf	24,990 sf	33,922 sf
Outdoor Common Open Space	33,124 sf	14,347 sf	47,471 sf
Indoor Common Open Space	22,246 sf	8,332 sf	30,578 sf
Subtotal Common Open Space	*55,370 sf*	*22,679 sf*	*78,049 sf*
Private Balconies	22,450 sf	15,950 sf	38,400 sf
Total Open Space Provided	**86,752 sf**	**63,619 sf**	**150,371 sf**
Total Open Space Required	61,075 sf	45,450 sf	106,525 sf

NOTES:

sf = square feet; du = dwelling units

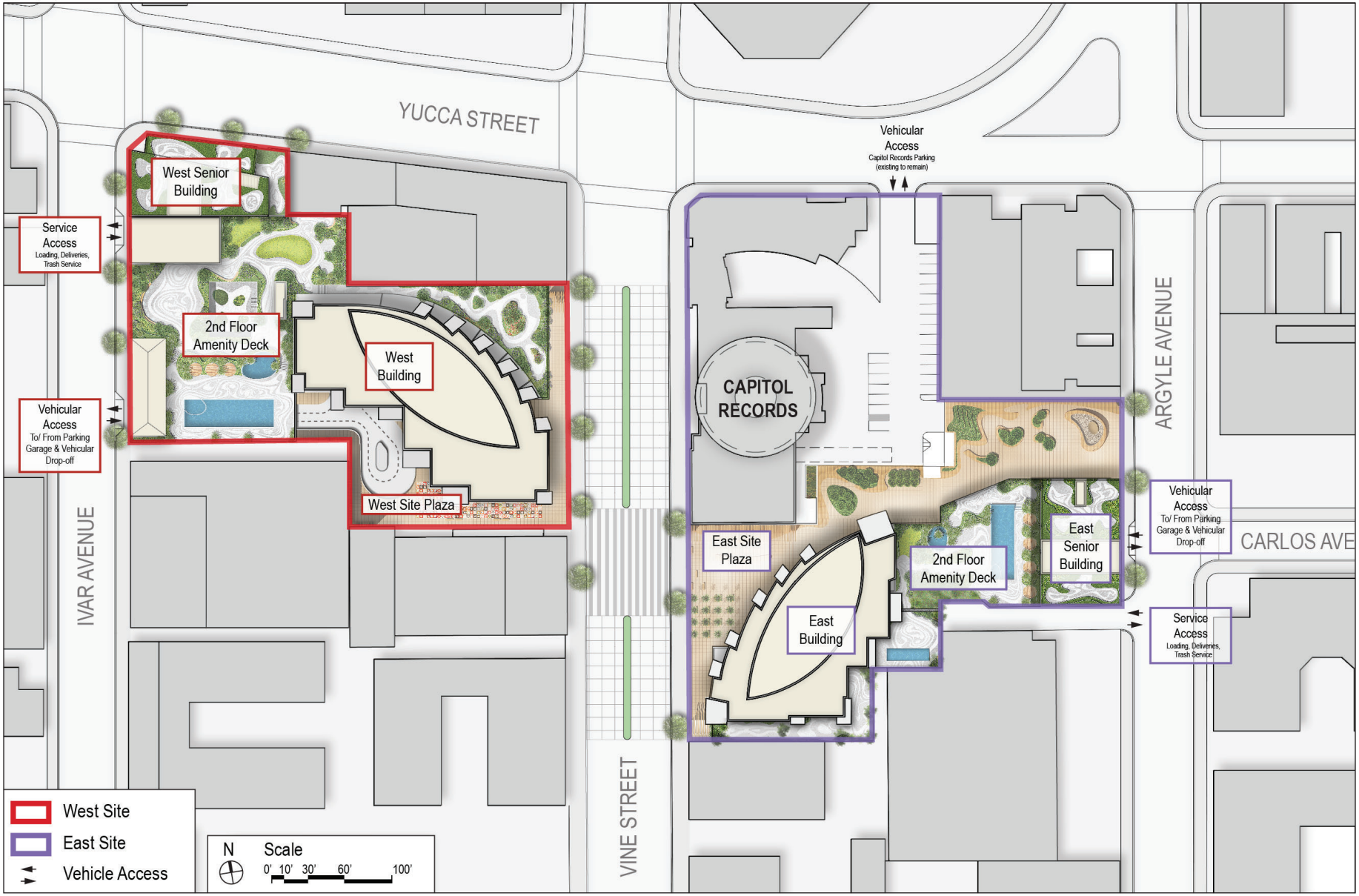
[a] Gross square footage is calculated with the inclusion of the 1,313 square-foot East Site Alley Merger and the 5,163 sidewalk merger (along Yucca Street and both sides of Vine Street) area.

[b] The maximum building height includes the bulkhead on the West Building and East Building (a non-occupiable additional level, housing only mechanical equipment) as well as all architectural elements (i.e., screen element, elevator shafts, mechanical bulkheads, parapets).

[c] The FAR is calculated by: the total buildable area (1,387,044 square feet) divided by the total Project Site lot area (200,971 square feet) = 6.901.

[d] As stated further below under Section 8, Anticipated Project Approvals, the Project is requesting a Conditional Use Permit pursuant to LAMC Section 12.24 W.19 for a unified development to allow floor area ratio averaging and residential density transfer between the East Site and the West Site. This would allow for the Project to park more on one-site to meet the total vehicular parking requirements.

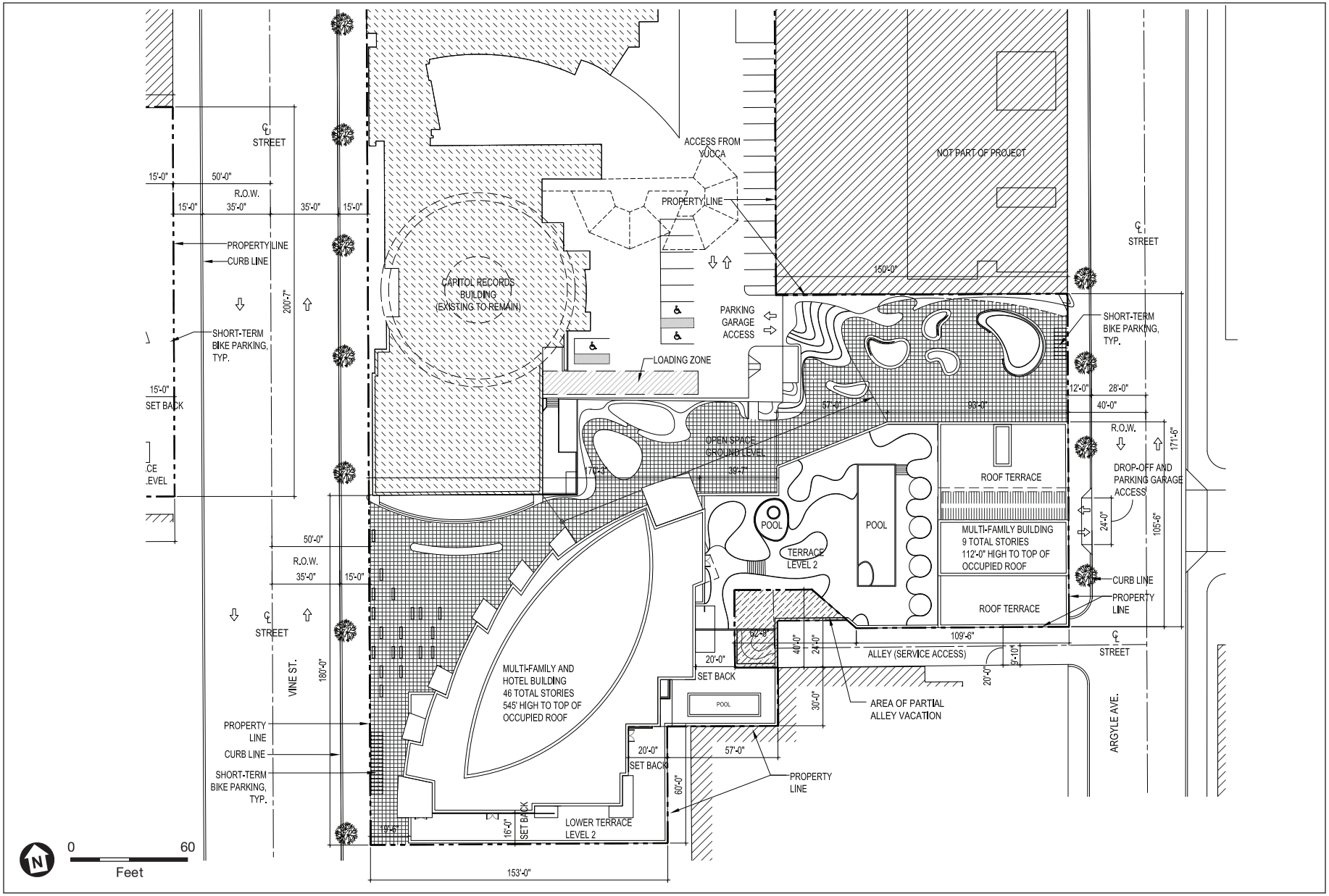
SOURCE: Handel Architects LLP, 2019 and James Corner Field Operations, 2019.



SOURCE: Handel Architects, 2019

Hollywood Center Project

Figure II-19
Conceptual Site Plan – Project with the East Site Hotel Option



SOURCE: Handel Architects, 2018

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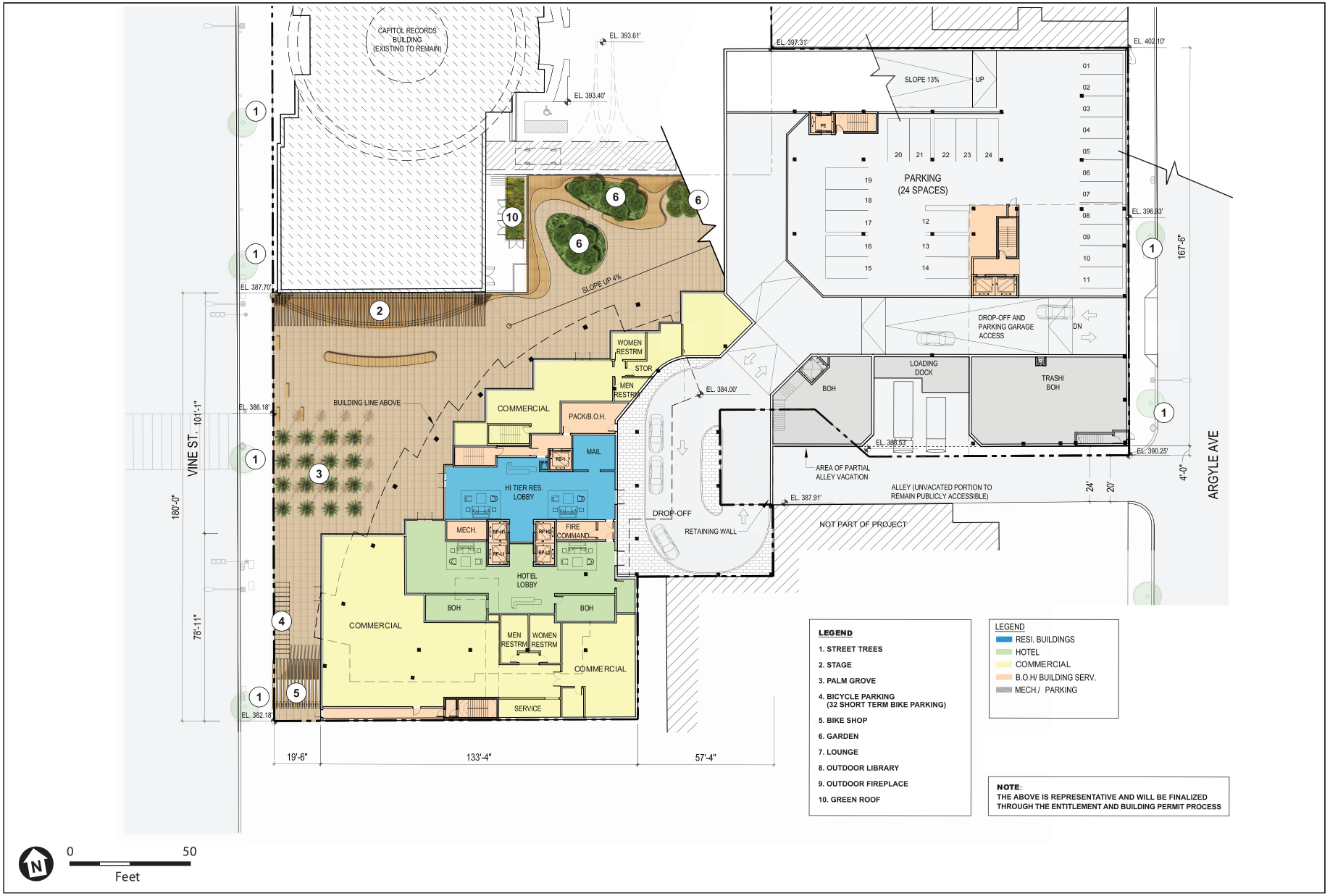
Figure II-20

Conceptual Plot Plan, East Site – Project with the East Site Hotel Option

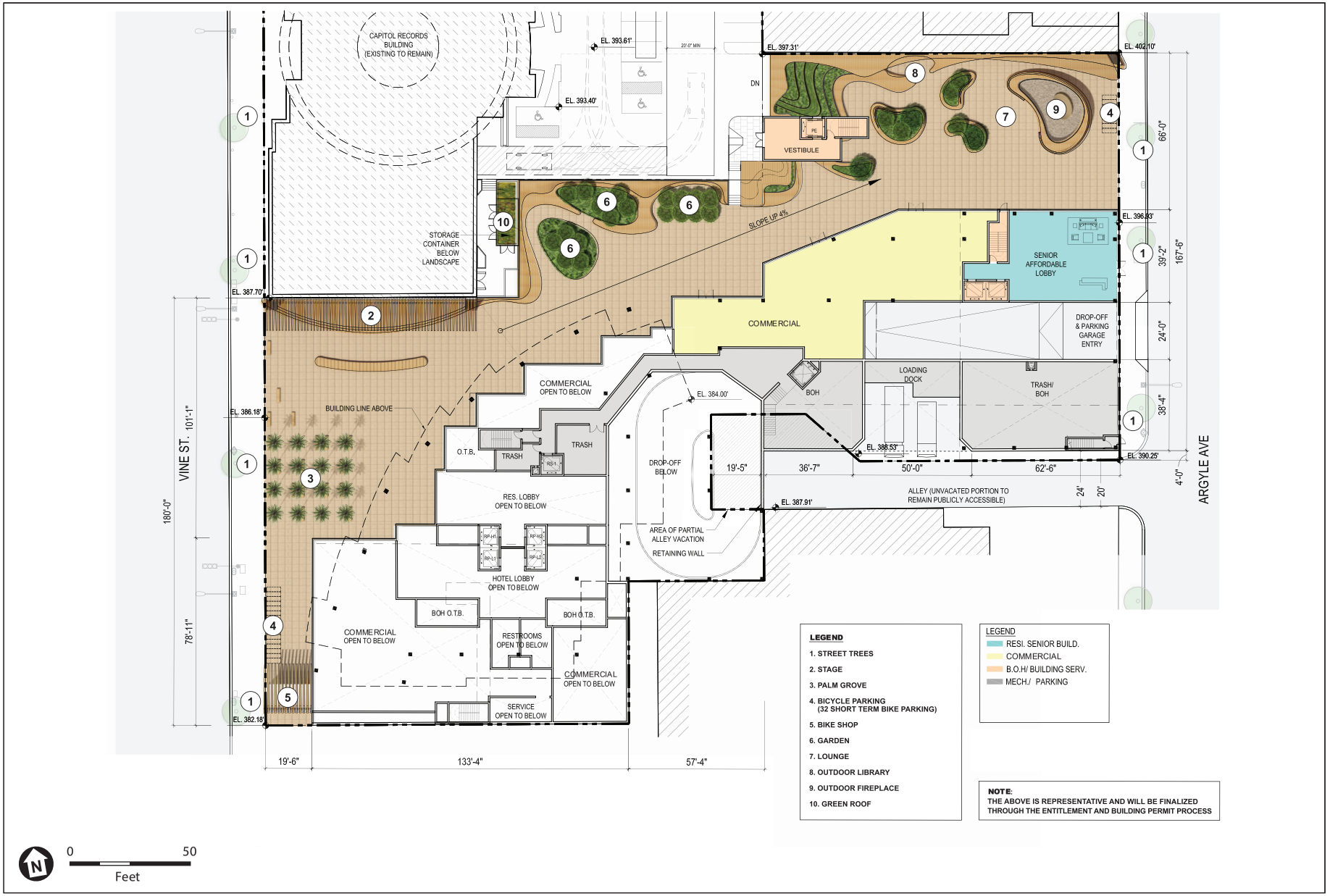


SOURCE: Handel Architects, 2020

Hollywood Center Project

Figure II-21

Level 1 Plan (Vine Street), East Site – Project with the East Site Hotel Option



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SOURCE: Handel Architects, 2020

Hollywood Center Project

Figure II-22

Level 1 Mezzanine Plan (Argyle Avenue), East Site – Project with the East Site Hotel Option

(a) East Building

There would be no change to building heights or massing, retail floor area, publicly accessible open space, or parking configuration for the East Building under the Project with the East Site Hotel Option. However, of the 423 residential units proposed within the East Building under the Project, 104 market-rate residential housing units from Levels 3 through 12 would be replaced with 220 hotel rooms, leaving a total of 319 market-rate residential housing units on Levels 13 through 46. The residential unit mix would include:

- 117 one-bedroom units
- 132 two-bedroom units
- 65 three-bedroom units
- 5 three-bedroom penthouse units

(b) East Senior Building

Under the Project with the East Site Hotel Option, the East Senior Building would contain 48 affordable housing units, in lieu of the 65 units which would otherwise be developed as part of the Project, for a total reduction of 17 housing units. LAMC Section 11.5.11 requires projects, which propose a minimum of 10 or more residential dwelling units in conjunction with a General Plan Amendment, Zone Change or Height District Change that results in increased allowable residential floor area, density or height, or allows a residential use where previously not allowed density, to set aside a minimum of 11 percent of the Project's total residential density for affordable housing. As the Project with the East Site Hotel Option would reduce the proposed residential density from 1,005 dwelling units to 884 dwelling units, the requisite number of affordable housing units required would correspondingly decrease from 133 units to 116 units. The units would include a mix of 40 one-bedroom units and eight two-bedroom units. Accordingly, under the Project with the East Site Hotel Option, the East Senior Building would be reduced from 11 stories to nine stories with non-occupiable additional floor to house mechanical building equipment only, resulting in a total building height of 131 feet above grade. **Table II-3**, *Comparison of Project and Project with the East Site Hotel Option*, shows a summary of the differences between the Project and the Project with the East Site Hotel Option.

Table II-4, *Project and Project with the East Site Hotel Option Gross and LAMC Floor Area Square Footages by Building*, provides a breakdown of gross square footage and square footage using the definition of floor area per the LAMC by building for the Project and the Project with the East Site Hotel Option. As shown in the table, the Project would have 2,183,897 total gross square feet of development, while the Project with the East Site Hotel Option would have 2,168,235 total gross square feet of development. The reduction in gross square footage results from a reduction in scale for the East Senior Building, as compared to the Project.

TABLE II-3
COMPARISON OF PROJECT AND PROJECT WITH THE EAST SITE HOTEL OPTION

	Project	East Site Hotel Option
Building Heights		
West Site Building	469 feet (35 stories)	Unchanged
West Senior Building	155 feet (11 stories)	Unchanged
East Site Building	595 feet (46 stories)	Unchanged
East Senior Building	150 feet (11 stories)	131 feet (9 stories)
Residential		
Market-Rate Units		
One-Bedroom	370 du	312 du
Two-Bedroom	370 du	330 du
Three-Bedroom	132 du	126 du
Subtotal Market-Rate Units	*872 du*	*768 du*
Senior Affordable Units		
One-Bedroom	112 du	99 du
Two-Bedroom	21 du	17 du
Subtotal Senior Affordable Units	*133 du*	*116 du*
Total Residential Units	***1,005 du***	***884 du***
Commercial		
Restaurant/Retail	30,176 sf	Unchanged
Hotel	N/A	130,278 sf
Total Floor Area	***1,287,150 sf***	***1,272,741 sf***
Floor Area Ratio	***6.973:1***	***6.901:1***
Open Space		
Publicly Accessible Open Space	33,922 sf	Unchanged
Outdoor Common Open Space	53,102 sf	47,471 sf
Indoor Common Open Space	35,958 sf	30,578 sf
Subtotal Common Open Space	*89,060 sf*	*78,049 sf*
Private Balconies	43,600 sf	38,400 sf
Total Open Space Provided	***166,582 sf***	***150,371 sf***
Total Open Space Required	*120,175 sf*	*106,525 sf*

NOTES:
sf = square feet; du = dwelling units
SOURCE: ESA, 2019.

TABLE II-4
PROJECT AND PROJECT WITH THE EAST SITE HOTEL OPTION GROSS AND LAMC FLOOR AREA SQUARE FOOTAGES

	Project		Project with the East Site Hotel Option	
	Gross SF[a]	**LAMC FAR SF[b,c]**	**Gross SF[a]**	**LAMC FAR SF[b,c]**
WEST SITE			No changes from Project in West Site	
West Senior Building				
• Senior Affordable Res.	67,705 sf	62,289 sf		
• Indoor Res. Amenities				
Level 2	1,974 sf	1,920 sf		
Indoor Lobby	2,000 sf	1,895 sf		
Subtotal	*3,974 sf*	*3,815 sf*		
• Mechanical	2,000 sf	-------- sf		
West Senior Subtotal	***73,679 sf***	***66,104 sf***		
West Building				
• Market Rate Residential	581,464 sf	534,947 sf		
• Indoor Res. Amenities				
Level 1M / Level 2	27,992 sf	25,753 sf		
Indoor Lobby	9,634 sf	9,249 sf		
Subtotal	*37,626 sf*	*35,002 sf*		
• Commercial				
Vine Street	3,969 sf	3,810 sf		
Ivar/ Yucca	9,251 sf	8,881 sf		
Subtotal	*13,220 sf*	*12,691 sf*		
• Parking	391,877 sf	-------- sf		
• Mechanical	39,079 sf	-------- sf		
West Subtotal	***1,063,266 sf***	***582,640 sf***		
West Site Total	**1,136,945 sf**	**648,744 sf**		

TABLE II-4
PROJECT AND PROJECT WITH THE EAST SITE HOTEL OPTION GROSS AND LAMC FLOOR AREA SQUARE FOOTAGES

	Project		Project with the East Site Hotel Option	
	Gross SF[a]	**LAMC FAR SF[b,c]**	**Gross SF[a]**	**LAMC FAR SF[b,c]**
EAST SITE				
East Senior Building				
• Senior Affordable Res.	67,149 sf	61,777 sf	51,898 sf	47,746 sf
• Indoor Res. Amenities				
Level 2	2,211 sf	2,034 sf	1,800 sf	1,656 sf
Indoor Lobby	2,000 sf	1,840 sf	2,000 sf	1,840 sf
Subtotal	*4,211 sf*	*3,874 sf*	*3,800 sf*	*3,496 sf*
• Mechanical	2,000sf	-------- sf	2,000 sf	-------- sf
East Senior Subtotal	***73,360 sf***	***65,651 sf***	***57,698 sf***	***51,242 sf***
East Building				
• Market Rate Residential	575,100 sf	529,092 sf	444,100 sf	408,572 sf
• Indoor Res. Amenities				
Other	4,561 sf	4,196 sf	4,561 sf	4,196 sf
Level 2	13,700 sf	12,604 sf	7,450 sf	6,854 sf
Indoor Lobby	10,193 sf	9,378 sf	5,837 sf	5,370 sf
Subtotal	*28,454 sf*	*26,178 sf*	*17,848 sf*	*16,420 sf*
• Commercial				
Vine Street	10,318 sf	9,905 sf	10,318 sf	9,905 sf
Argyle / Paseo	7,896 sf	7,580 sf	7,896 sf	7,580 sf
Subtotal	*18,214 sf*	*17,485 sf*	*18,214 sf*	*17,485 sf*
• Parking	317,739 sf	-------- sf	317,739 sf	-------- sf
• Mechanical	34,085 sf	-------- sf	34,085 sf	-------- sf
• Hotel	N/A	N/A	141,606 sf	130,278 sf
East Subtotal	**973,592 sf**	**572,755 sf**	**973,592 sf**	**572,755 sf**
East Site Total	**1,046,952 sf**	**638,406 sf**	**1,031,290 sf**	**623,997 sf**
GRAND TOTAL SF (East + West Sites)	**2,183,897 sf**	**1,287,150 sf (6.971:1 FAR)**	**2,168,235 sf**	**1,272,741 sf (6.901:1 FAR)**

TABLE II-4
PROJECT AND PROJECT WITH THE EAST SITE HOTEL OPTION GROSS AND LAMC FLOOR AREA SQUARE FOOTAGES

	Project		Project with the East Site Hotel Option	
	Gross SF[a]	LAMC FAR SF[b,c]	Gross SF[a]	LAMC FAR SF[b,c]

[a] Definition of Gross Square Footage (SF) per California Building Code 2019 Chapter 2 – The floor area within the inside perimeter of the exterior walls of a building, exclusive of vent shafts and courts, without deduction for corridors, stairways, ramps, closets, the thickness of interior walls, columns or other features. The floor area of a building, or portion thereof, not provided with surrounding exterior walls shall be the usable area under the horizontal projection of the roof or floor above. The gross floor area shall not include shafts with no opening or interior courts.

[b] Project FAR numbers used throughout this document, unless otherwise specified, are calculated in accordance with LAMC Section 12.03, which is the area, in square feet, confined within the exterior walls of a building, but excluding the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space dedicated to bicycle parking, space for the landing and storage of helicopters, and basement storage areas.

[c] Pursuant to the incentive requested under LAMC Section 11.5.11(e), Project FAR numbers, unless otherwise specified, exclude residential balconies. The gross area of these balconies is approximately 78,120 sf on the West Site and approximately 90,200 sf on the East Site.

SOURCE: ESA, 2020.

The height reduction of the East Senior Building from 11 to nine stories under the Project with the East Site Hotel Option is illustrated in **Figure II-23**, *Project with the East Site Hotel Option Building Sections*. Amenity areas associated with the Project with the East Site Hotel Option are shown in **Figure II-24**, *Project with the East Site Hotel Option Level 2 and Amenity Deck*. Under the Project with the East Site Hotel Option, the outdoor amenity deck would include separate residential and hotel pool areas. Indoor spaces on Level 2 would include a multi-purpose room (1,020 square feet), a hotel fitness room, and various hotel conference rooms. The multi-purpose room could be used for group activities, such as but not limited to fitness, games, and entertainment, and the conference rooms would be used by hotel patrons for meetings and other events. There would be no change to uses on the West Site under this Option.

c) Design and Architecture

The architecture of the Project is distinct from, but compatible with, the modernist architectural character of the Capitol Records Building and the greater Hollywood neighborhood. The proposed buildings have been located and configured to preserve important views of the Capitol Records Building and to promote compatibility between new construction and the historic Capitol Records Complex. The West and East Buildings have been articulated in a manner that responds to the design of the Capitol Records Building. The West and East Buildings, together with the Capitol Records Building, are asymmetrically centered on Vine Street, highlighting the Capitol Records Building's prominence. The façades of the West and East Buildings oriented toward the Capitol Records Building and the Hollywood Hills have been designed to curve softly to respond to the form of the Capitol Records Building while maximizing the width of view corridors into and through the Project Site. These curved exterior walls of the West and East Buildings also include balconies intended to evoke the signature sunshades of the Capitol Records Building. The remaining façades, oriented south toward Hollywood, adopt the rectilinear language of the City's grid and more traditional buildings. A conceptual rendering of the Project is depicted in **Figure II-25**, *Simulated Aerial View from the East*, **and Figure II-26**, *Simulated View from the North*.

The West and East Senior Buildings are also designed to be responsive to the surrounding urban context. They are intended to anchor the outward-facing edges of the Project, acting as gateways to the Project Site. Their sizes (each at 11 stories, or nine stories on the East Site under the Project with the East Site Hotel Option) pick up on the typical mid-rise height seen throughout the greater Hollywood area. Both the West and East Senior Buildings would feature metal panel façades characteristic of modern urban architecture. The West and East Senior Buildings would front on Ivar and Argyle Avenues, respectively. This arrangement creates buildings that are oriented outward with circulation that encourages residents to engage with their surrounding community, in addition to

making use of the Project's publicly accessible open spaces. The active ground floor and mezzanine level restaurant/retail uses would enhance the Project Site's connections to surrounding sidewalks, streets and land uses.

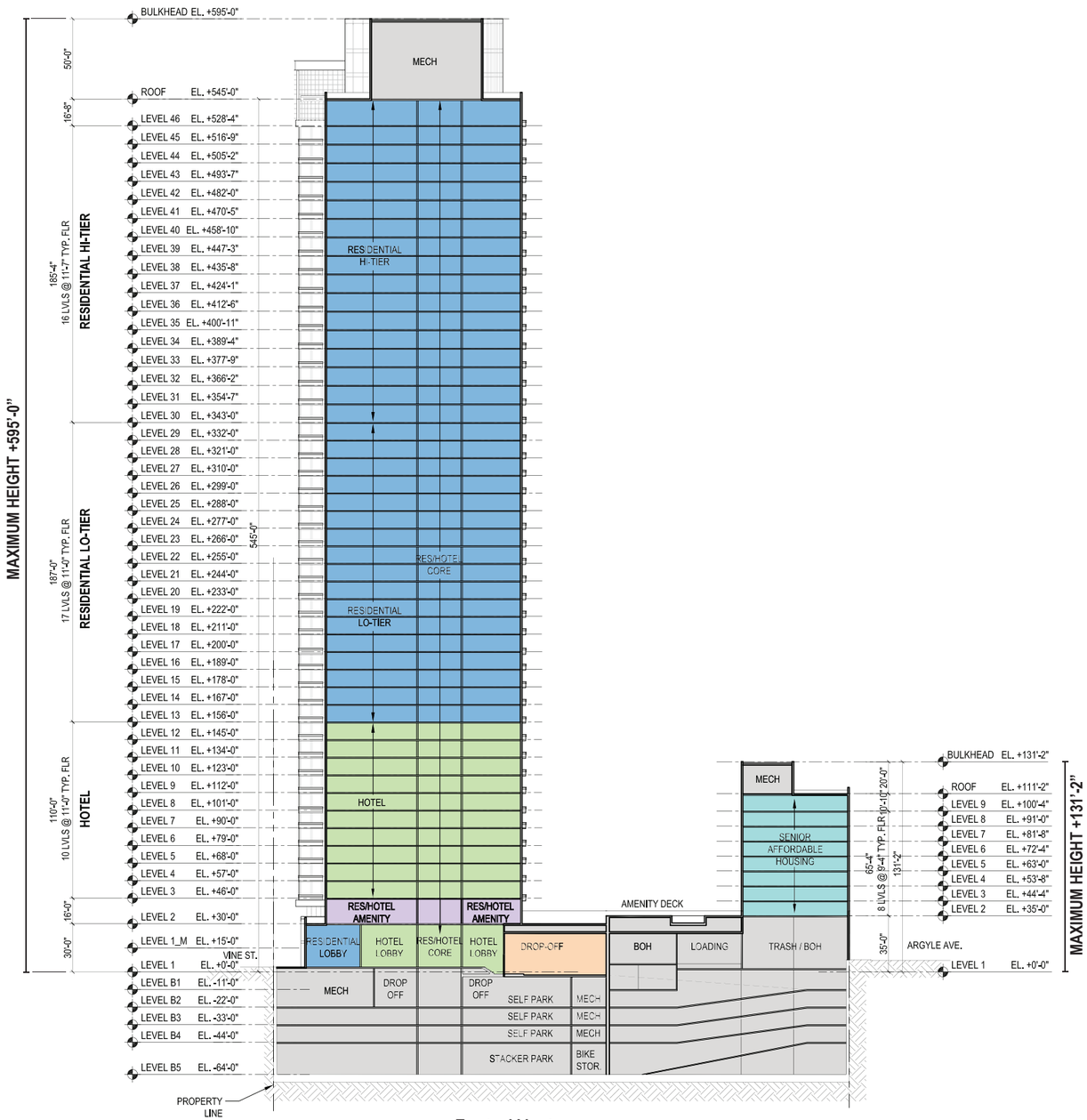
The Project's focuses density in the center of the development along Vine Street, where historically taller buildings in Hollywood have been located; and locates the Senior Buildings on the periphery of the Project Site to help make a smooth massing transition into the surrounding community. In order to preserve the strong pedestrian nature of Vine Street, which would include the paseo and other pedestrian connectivity features (as further described under Subsection 7.e, *Access and Circulation*, below) under the Project, all vehicular access to the Project would be provided by driveways located on Ivar Avenue, Yucca Street, and Argyle Avenue. Access to the West Site would be provided via a new driveway on Ivar Avenue. Access to the East Site would be provided from Argyle Avenue. The existing Yucca Street driveway, located between Vine Street and Argyle Avenue, would provide dedicated access to the Capitol Records Building replacement parking located in the East Site parking garage, and direct access to the Capitol Records Building. Neighborhood features, such as the Hollywood Walk of Fame, have also helped define the proposed vehicular access strategy. The Project would avoid new curb cuts along the Hollywood Walk of Fame and would remove seven (7) of the existing curb cuts along Vine Street. In total, the Project would have two (2) curb cuts on the West Site and three curb cuts on the East Site – along Ivar Avenue, Argyle Avenue, and Yucca Street.

a) Open Space, Landscaping, and Public Art

(1) Open Space

Pursuant to LAMC Section 12.21 G, based on the proposed number of housing units and the mix of unit types, the Project would be required to provide at minimum of 120,175 square feet of usable open space. Figures II-8 and II-14 provide Conceptual Plans of the Project's proposed outdoor ground level spaces on the West and East Sites, respectively.

The Project, includes a variety of usable open spaces designed to create an active pedestrian experience adjacent to the Capitol Records Complex. As depicted in Table II-1, the Project proposes approximately 166,582 square feet of open space, including approximately 33,922 square feet of publicly accessible open space, 89,060 square feet of common open space, and 43,600 square feet of private open space in the form of private balconies. Table II-1 provides a breakdown of all open space components provided for the West Site, East Site and for the Project overall.



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SOURCE: Handel Architects, 2020

Hollywood Center Project

Figure II-23
Project with the East Site Hotel Option Building Sections

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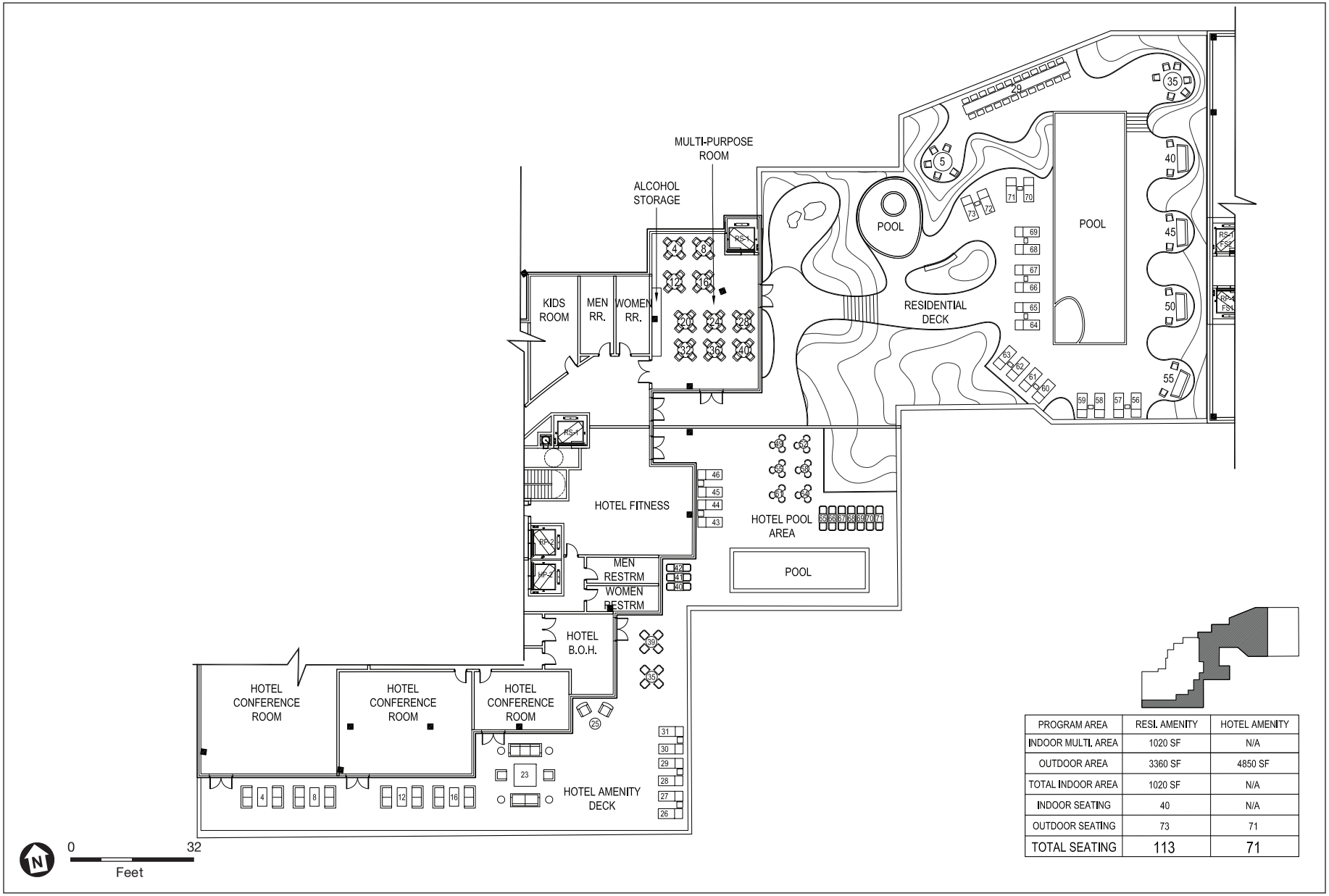

PROGRAM AREA	RESI. AMENITY	HOTEL AMENITY
INDOOR MULTI. AREA	1020 SF	N/A
OUTDOOR AREA	3360 SF	4850 SF
TOTAL INDOOR AREA	1020 SF	N/A
INDOOR SEATING	40	N/A
OUTDOOR SEATING	73	71
TOTAL SEATING	113	71

D170105.00

SOURCE: Handel Architects, 2019

Hollywood Center Project

Figure II-24
Project with the East Site Hotel Option Level 2 and Amenity Deck

D170105.00

SOURCE: Shimahara, 2018

Hollywood Center Project

Figure II-25
Simulated Aerial View from the East

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SOURCE: Shimahara, 2019

Hollywood Center Project

Figure II-26
Simulated View from the North

(a) Public Open Space

Ground floor, publicly accessible open space would be provided to connect the Project Site to the surrounding uses, including the Pantages Theatre and the Hollywood Walk of Fame. The Open Space Plan would remove surface parking lots and provide cultural and social amenities such as paseo linkages, plazas, and enhanced and activated street fronts. The Project would also incorporate a public art program in conjunction with landscape and open space design.

The Project's open space amenities at the ground level would be designed to maintain a visual connection with the street fronts and public paseo while helping to activate the plazas by drawing in pedestrian activity. The wide, landscaped paseo is proposed for pedestrian use and would extend east–west through the Project Site, connecting Ivar Avenue to Vine Street and Vine Street to Argyle Avenue. The paseo would function as a public open space amenity at the terminus of the Hollywood Walk of Fame. Along the paseo, residential lobbies and commercial spaces would add pedestrian interest and support outdoor uses.

The West Plaza would include flexible space, such as portions of the paseo, where visitors can view the Capitol Records Building (Figure II-16). Within the East Plaza, shopping, outdoor seating, landscaping, open-air dining, public performances, art installations, and special events, as described in more detail below, would be available to the public. Both the West Plaza and East Plaza include ground floor restaurant uses that would activate the respective street frontages along Vine Street and Argyle Avenue.

Within the East Plaza, three distinct areas are proposed, as shown in Figure II-16**,** and as described below:

- Lounge: An approximately 8,163-square-foot outdoor gathering space, with seating, fireplace, and library.
- East Plaza: An approximately 10,198-square-foot performance area with a stage to host public acoustic performances by nearby school and community music groups, accented by the existing "Hollywood Jazz 1942–1972" mural and proposed outdoor seating to view performances or gather when the stage is inactive. The Plaza would also feature a landscaped palm tree grove and a bike center.
- Garden: An approximately 4,499-square-foot landscaped area, situated away from the adjacent streets and located inside of the block to provide a grassy area, seating alcoves, and a water feature to serve as a transition between the Lounge and Plaza areas.

(b) Performances and Events in Paseo/Plazas

The performance area and events would be situated on the East Plaza, with a maximum event attendance capacity of 350 people. There could be up to two performances daily, including one during the mid-day period and one during the afternoon, not to exceed 10 performances per week, including weekends. The

performances would not allow use of an amplified sound system but could include ambient music speakers with prerecorded, low-level, background music. The performances would primarily consist of acoustic musical performances, plays or other theatrical performances, and outdoor fitness classes. Each performance would be up to approximately one to two hours in duration and shall end by dusk. When special events occur within these spaces, set-up may begin as early as 10:30 A.M., events would start no earlier than 11:00 A.M., and events would end at dusk. Janitorial services would be performed regularly each day to ensure proper maintenance of the plaza for the enjoyment of residents and visitors.

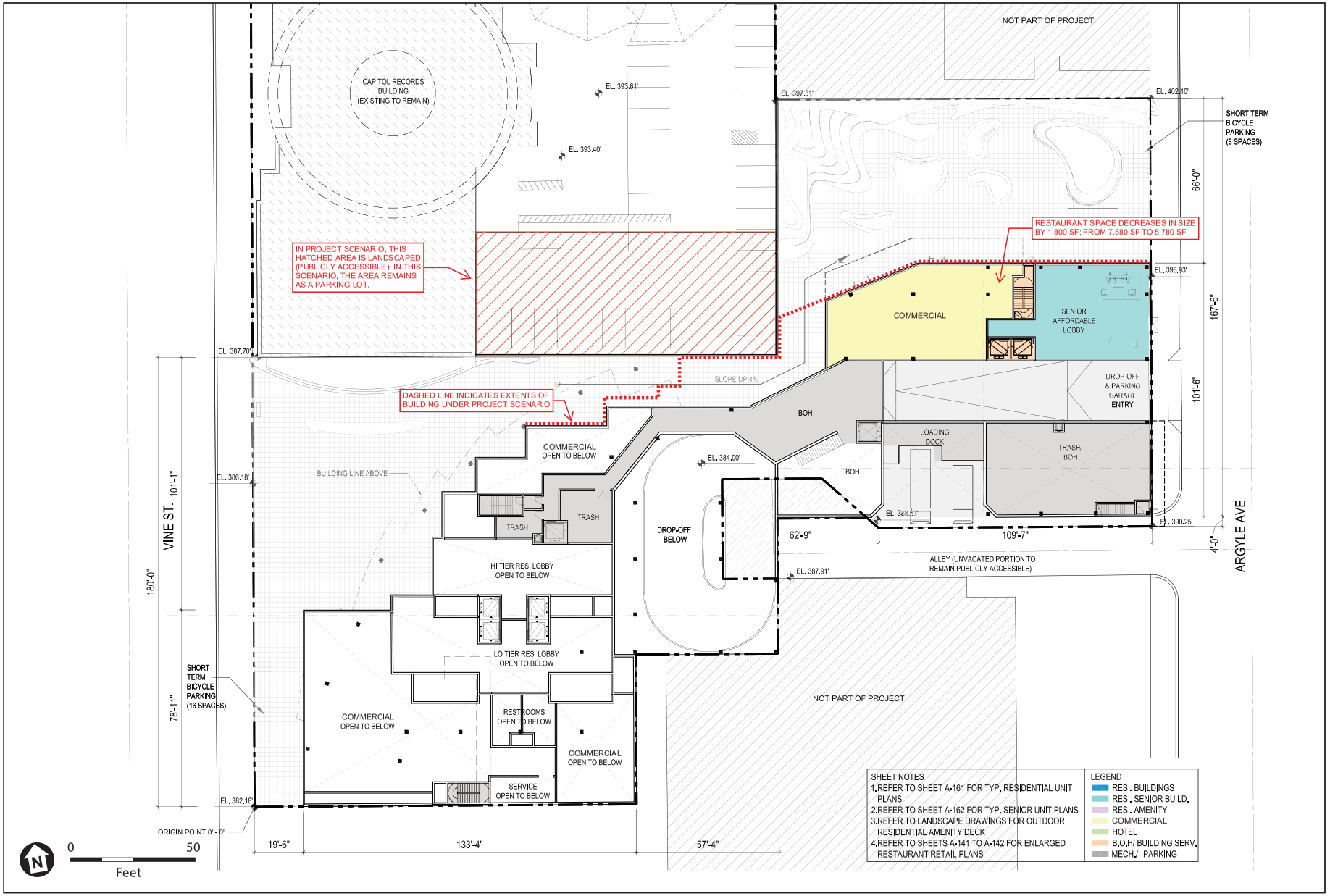
(c) Non-Public Open Space (Common and Private Open Space)

Usable common open space that is not open to the public would include indoor residential amenity recreational spaces comprised of fitness rooms, community rooms, children's rooms, libraries, and screening rooms within each building on both the West and East Sites; and outdoor residential amenities such as a pool on the Level 2 deck of both the West Site and East Site. See Section 7.b), Development Program, above, for a list of amenities within each building on the West and East Sites. The Amenity Decks (Level 2) on both the East Site and West Site may include ambient music speakers for background music only and would host building events, such as mixers, speaker series, and lectures. When special events occur within these spaces, events would end by 11:00 P.M. In addition, 43,600 square feet of private open space in the form of private balconies would be provided by the Project.

(d) Capitol Records Lot Scenario

The Project includes a lease between the Applicant and Capitol Records, wherein Capitol Records must consent to certain proposed improvements that may impact its use of the property. Specifically, Capitol Records must grant its consent to portions of the proposed open space area on the East Site. Depending upon negotiations on use of the space, the East Site's open space area may be reduced to accommodate Capitol Records. Under this Capitol Records Lot Scenario, the lounge and plaza areas described above would be slightly reduced in size, and the garden would be removed. As shown in **Figure II-27**, *Comparison of East Site Capitol Records Lot Scenario*, the publicly accessible ground floor open space on the East Site for the Project, as well as the Project with the East Site Hotel Option, would be reduced from 24,990 square feet to 23,373 square feet (a reduction of 1,617 square feet). Additionally, common open space on the Level 2 amenity deck would be reduced from 15,178 square feet to 14,138 square feet (a reduction of 1,040 square feet). In total, open space would be reduced by 2,657 square feet.[13] Under any scenario, the proposed open space area would comply with all applicable open space requirements pursuant to LAMC Section 12.21 G.

[13] As a result of this change in open space, the ground floor restaurant/retail space would be reduced by 1,800 square feet. See Figure II-27.



SOURCE: Handel Architects, 2020

Hollywood Center Project

Figure II-27
Comparison of East Site Capitol Records Lot Scenarios

(e) Project with the East Site Hotel Option

Pursuant to LAMC Section 12.21 G, based on the proposed number of housing units and the mix of unit types, the Project with the East Site Hotel Option would be required to provide a minimum of 106,525 square feet usable open space as shown in Table II-2, above. A total of 150,371 square feet of open space would be provided, comprised of 33,922 square feet of publicly accessible open space; 47,471 square feet of outdoor common open space with the same configuration as the Project; and approximately 30,578 square feet of indoor common open space and approximately 38,400 square feet of private open space in the form of private balconies, with a different configuration than the Project. Figure II-22 provides an illustration of the proposed outdoor ground floor open space on the East Site. The West Site's open space would remain the same.

(2) Landscaping

The Project Site currently contains 48 trees, 14 of which are considered "significant" trees. In addition, there are 16 trees which are City of Los Angeles rights-of-way trees. None of the 48 trees are considered "protected" by the City of Los Angeles Tree Preservation Ordinance No. 177,404.

All existing trees on the Project Site, as well as street trees that are immediately adjacent to the Project Site boundaries, would be removed. The Project would provide 130 new trees on the West Site and 122 new trees on the East Site for a total increase of 204 trees, including street trees.[14] The Project would further comply with the City's Urban Forestry Division's requirements, which requires street tree replacement on a 2:1 basis and approval by the Board of Public Works.

Pursuant to LAMC Section 12.21 G, a minimum of 25 percent of the common open space area shall be planted with ground cover, shrubs or trees or 23,844 square feet. The Project would provide 23,844 square feet of landscaped area throughout the Project Site, comprised of native plants, shrubs, perennials, and groundcover. Both the West and East Sites would provide a large elevated garden for residents on the respective Level 2 amenity decks, outdoor amenity spaces with planting areas and canopy trees, and planting areas on the rooftop terraces for both Senior Buildings. Landscaping would be provided along the street edges and throughout the Project's open space areas and would utilize drought-tolerant native plants. The Project with the East Site Hotel Option would not change any aspect of publically accessible open space provided at grade. There would be no change in the quantity of open space provided at grade, the number of trees, or planting area.

[14] As defined in LAMC Section 12.21 G.2 (a)(3): At least one 24-inch box tree for every four dwelling units shall be provided on-site and may include street trees in the parkway. For a surface area not located directly on finished grade that is used for common open space and located at ground level or the first habitable room level, shrubs and/or trees shall be contained within permanent planters at least 30 inches in depth, and lawn or ground cover shall be at least 12 inches in depth. All required landscaped areas shall be equipped with an automatic irrigation system and be properly drained.

The only change would be a reduction of 5,631 square feet of common open space due to part of the East Site level two amenity deck being converted to hotel use. However, due to the reduction in dwelling units under the Project with the East Site Hotel Option, it would still meet its open space requirements.

b) Access and Circulation Parking, and Bicycle Amenities

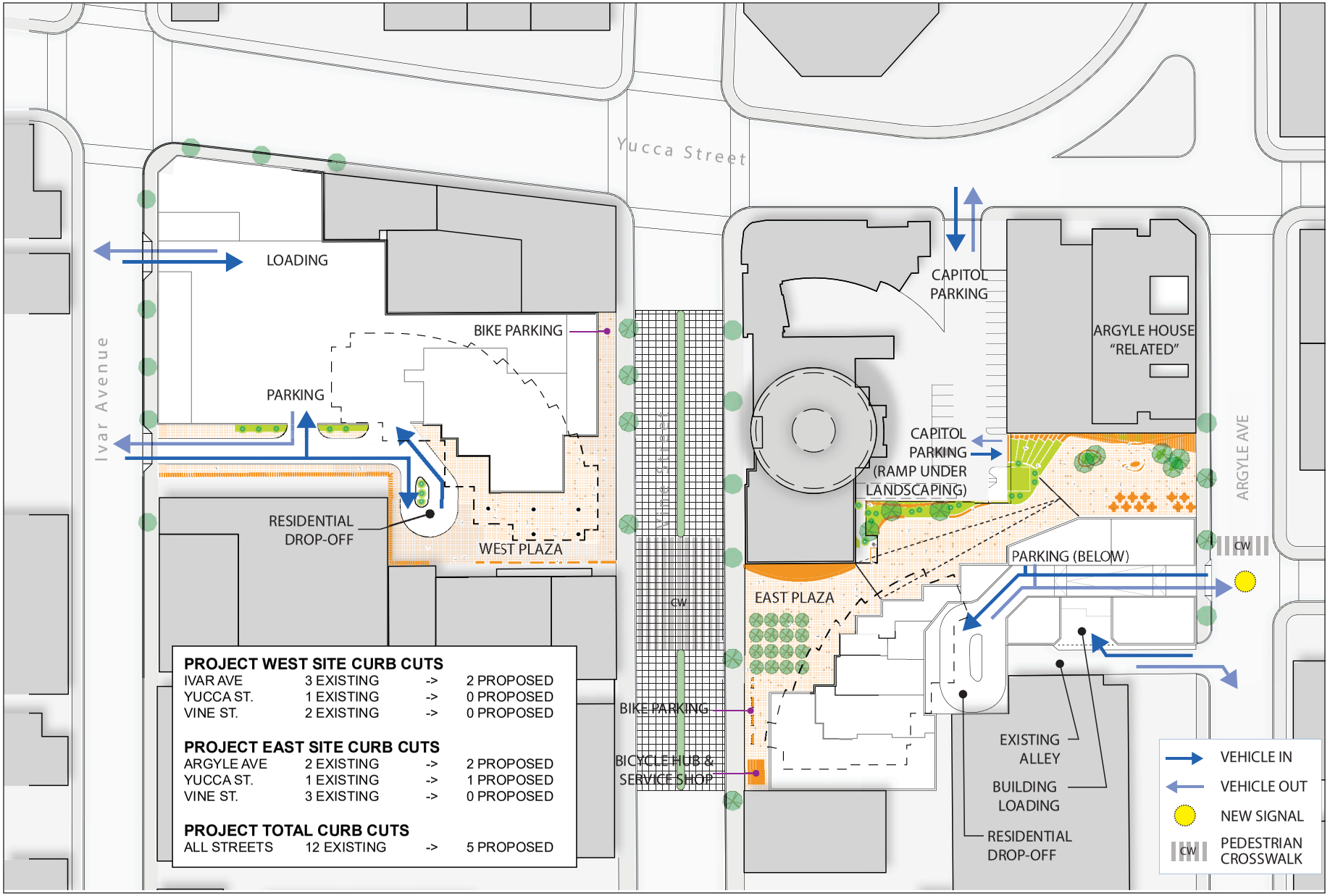
(1) Vehicular Access

Vehicular access to the Project Site is illustrated in **Figure II-28**, *Project Site Vehicular Access*. All vehicles would access the Project Site from Ivar Avenue, Argyle Avenue, and Yucca Street, allowing Vine Street and the Hollywood Walk of Fame to completely avoid curb cuts. There are currently six curb cuts each on the West and East Sites (12 total); the Project would change the locations of and reduce the number of curb cuts to two curb cuts on the West Site and three curb cuts on the East Site. Furthermore, the existing curb cuts that would be removed would reduce vehicle conflicts and interference with pedestrian activity along the Hollywood Walk of Fame.

(a) West Site Vehicular Access and Parking

Access to the West Site would be provided via two driveways on Ivar Avenue, as described below. There would be no vehicular access on Vine Street, which bifurcates the West Site and East Site. Access to the trash receptacles, the loading zone, and BOH would be accessed from the northern driveway located on Ivar Avenue, south of Yucca Street. Access to all levels of the parking garage (Level 1 through B5) would be provided from the southern Ivar Avenue driveway. A passenger drop-off zone would be provided on Level 1, adjacent to the West Building residential lobbies. A dual-purpose area with 15 queuing spaces would be provided within the second subterranean level (Level B2) for valet and ride-hailing services (such as Uber, Lyft, taxis, etc.) drop-off and pick-up.

A total of 837 vehicular parking spaces would be provided on the West Site, of which 798 spaces would be provided within the five subterranean levels of the parking garage, and 39 spaces would be provided within an enclosed at-grade parking area on Level 1 (below the mezzanine level). A total of 604 spaces would be allocated for the West Building, 34 spaces for the West Senior Building, and 199 spaces for the commercial uses and as part of the Capitol Records Building parking replacement. Of the 837 parking spaces, 326 spaces would be provided using 163 mechanical double stackers arranged in tandem on the 5th subterranean level (Level B5) for use by valet only. The remaining 511 parking spaces within the parking garage (Level 1 through B4) would be self-park. Of the 511 self-park spaces, 211 parking spaces would be electric vehicle (EV)-ready parking spaces.



SOURCE: Handel Architects, 2020

Hollywood Center Project

Figure II-28
Project Site Vehicular Access

(b) East Site Vehicular Access and Parking

Access to the East Site would be provided via two driveways on Argyle Avenue, as described below. There would be no vehicular access on Vine Street, which bifurcates the West Site and East Site. Access to the trash receptacles, the loading dock, and BOH would be accessed from the southern driveway located within the existing alley off of Argyle Avenue. Access to all subterranean levels (B1 through B5) of the parking garage would be provided from the northern Argyle Avenue driveway located directly opposite of Carlos Avenue and north of the existing alley. This four-way intersection at Argyle and Carlos Avenues would be signalized and provide a pedestrian crossing across Argyle Avenue. A passenger drop-off zone would be provided on Level 1, adjacent to the East Building residential lobbies. A dual-purpose area with 23 queuing spaces would be provided within the second subterranean level (Level B2) for valet and ride-hailing services (such as Uber, Lyft, taxis, etc.) drop-off and pick-up.

The existing Yucca Street driveway, located between Vine Street and Argyle Avenue, would continue to provide dedicated access to the Capitol Records Building existing surface parking lot via a two-way, stop-controlled, full-access driveway. Within the Capitol Records Building surface parking lot, access would be provided to the dedicated replacement parking for the Capitol Records Building located in Level 1 of the parking garage.

A total of 684 vehicular parking spaces would be provided on the East Site. There would be 660 spaces accessed from Argyle Avenue, provided within five-levels of subterranean parking (Levels B1 through B5). There would also be 24 spaces accessed from Yucca Street, provided within a separate enclosed at-grade parking area on Level 1 (below the mezzanine level). These 24 spaces are dedicated for use by the Capitol Records Building. A total of 585 spaces would be allocated for the East Building, 33 spaces for the East Senior Building, 66 spaces for the commercial uses and as part of the Capitol Records Building parking replacement. Of the 684 parking spaces, 260 spaces would be provided using 130 mechanical double stackers arranged in tandem on the fifth subterranean level (Level B5) for use by valet only. The remaining 424 parking spaces on the at-grade Level 1 and Levels B1 to B4 would be self-park. Of the 424 self-park spaces, 69 parking spaces would be EV-ready parking spaces.

(c) Project With East Site Hotel Option

Under the Project with the East Site Hotel Option, access and the number and location of parking spaces for both the West and East Sites would not change from that of the Project. However, the allocation of parking spaces on the East Site would change accordingly with the reduction in the number of residential units and addition of hotel rooms. Of the 684 vehicular parking spaces, 479 spaces would be allocated for the residential uses, 98 spaces for the hotel, and 107 spaces for

the commercial uses and as part of the Capitol Records Building parking replacement.

(2) Bicycle Access and Parking

As shown in **Figure II-29**, *Project Site Bicycle Parking,* 551 bicycle parking spaces would be provided consistent with the LAMC 12.21 A.16, including 489 long-term spaces in subterranean parking levels, and 62 short-term spaces at the ground level within the exterior plaza areas of both the West and East Sites. Specifically, the West Site would provide 247 long-term and 30 short-term bicycle parking spaces; and the East Site would provide 242 long-term and 32 short-term bicycle spaces parking spaces. Bicycle maintenance and shower areas would also be provided within the garage for each of the West and East Sites.

(a) Project with the East Site Hotel Option

Under the Project with the East Site Hotel Option, the West Site would provide the same amount of bicycle parking, while the East Site would provide a total of 277 bicycle parking spaces, comprised of 226 long-term and 51 short-term spaces. As with the Project, all long-term bicycle parking would be located in the subterranean parking levels, and short-term bicycle parking would be located within the exterior plaza areas of the West and East Sites.

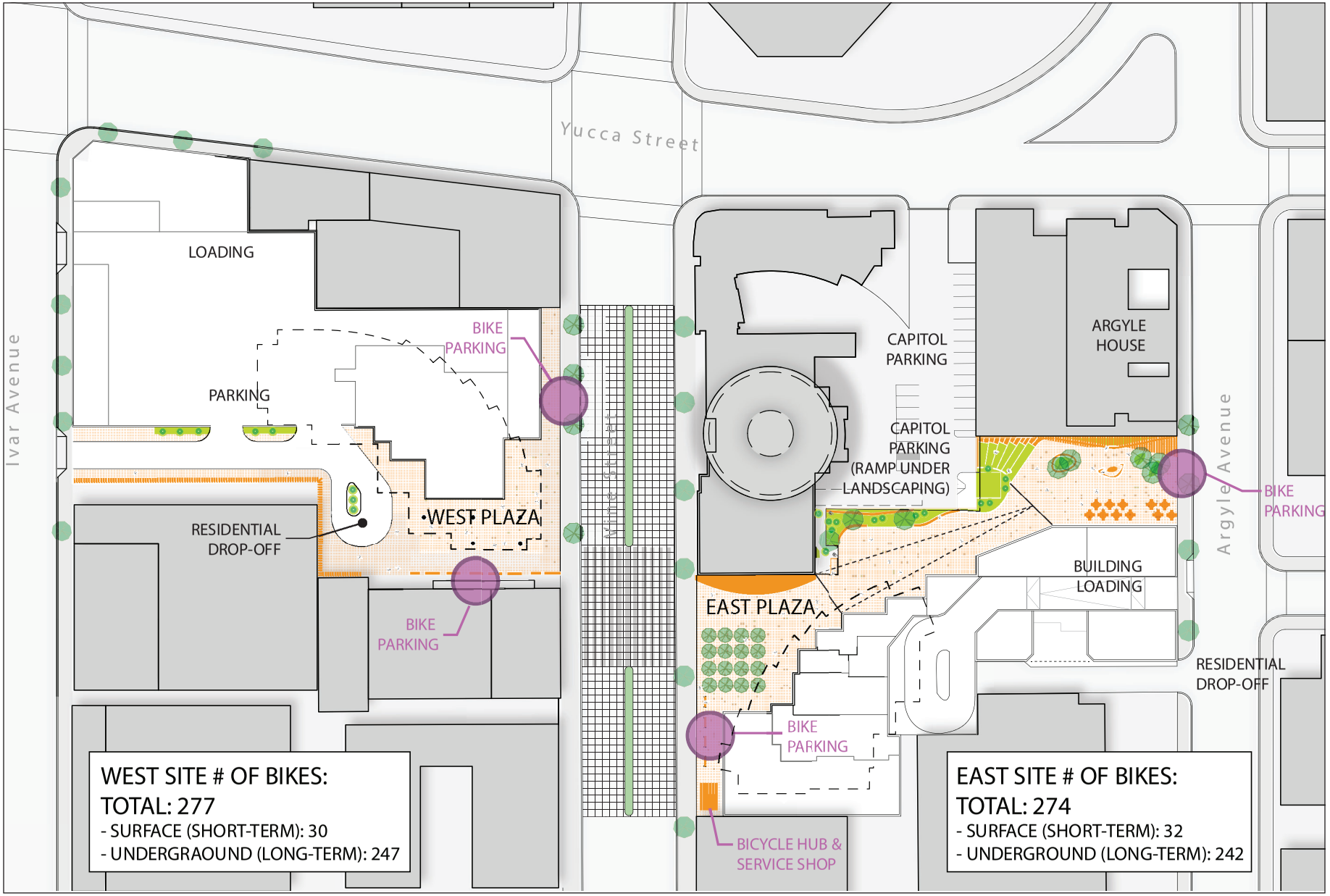
(3) Pedestrian Access

Pedestrian access to the Project Site would be provided via sidewalks along Yucca Street, Ivar Street, Vine Street and Argyle Avenue, as well as along the, landscaped paseo extending east–west through the Project Site connecting Ivar Avenue to Vine Street and Vine Street to Argyle Avenue (see Figure II-16).

Pedestrian access on the West Site would be provided from Vine Street for the main residential lobby of the West Building; from Ivar Street for the ground level lobby of the West Senior Building; and from Vine Street, Yucca Street, and Ivar Avenue for the restaurant uses on the West Site.

Pedestrian access on the East Site would be provided from Vine Street for the residential lobby of the East Building; from Argyle Avenue for the ground level lobby of the East Senior; and from Argyle Avenue, Vine Street, and from the landscaped paseo for the restaurant uses on the East Site.

The Project's pedestrian paseo and a proposed signalized crossing across Argyle Avenue (see Figure II-28) are intended to facilitate pedestrian connectivity and align with existing mid-block crosswalks on Vine Street and Ivar Avenue. The Project's pedestrian features would be integrated into the adjacent pedestrian network to maintain connections with multimodal facilities.



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SOURCE: Handel Architects, 2019

Hollywood Center Project

Figure II-29
Project Site Bicycle Parking

As noted above, the Project has been designed to have no driveways along Vine Street. By removing these driveways from Vine Street, the Project would help restore continuity to the Walk of Fame, while reducing pedestrian/vehicular conflicts that currently exist along the Vine Street frontages of the West Site and East Site. The Project with the East Site Hotel Option does not change any aspect of public pedestrian circulation.

c) Lighting and Signage

Portions of the Project at or above the highest occupiable floor would incorporate architectural accent lighting to emphasize the Project's architectural identity as part of the skyline and may be backlit. Exterior architectural accent lighting on all buildings would be utilized to enhance the perception of each building's architectural character and create visual interest along the streets and public spaces from which they are visible; as well as to reinforce the composition created by the West Building, East Building and the Capitol Records Building.

All architectural lighting would be configured with timer or photo-sensors to automatically turn on at dusk and turn off at dawn. The architectural accent lighting would have the ability to be lit in a variety of colors, which may be used to celebrate holidays or days of cultural significance. The Project would observe no more than 60 such days per calendar year to utilize the colored architectural accent lighting. None of the proposed architectural accent lighting would include any moving lights or dynamic lighting effects. All proposed lighting would be steady in intensity and color throughout a single night. No still or moving images would be projected onto the buildings.

Project signage would include building identification, wayfinding, and security markings. Commercial and residential signage would be similar to other signage in the Project vicinity, and no off-site signage is proposed. All proposed signage would conform to the size, type, and placement requirements of LAMC Article 4.4 and Ordinance No. 181,340, the Hollywood Signage Supplemental Use District.[15] Pedestrian and publicly accessible areas would be well-lit for security. Project lighting would also include ground level commercial lighting, common and private open area lighting, interior and outdoor lighting from commercial and residential areas, and accent lighting. Light fixtures would share a consistent design aesthetic and would be configured to minimize light pollution. Additionally, light fixtures on the Project Site would be shielded and directed toward the areas to be lit and away from any adjacent sensitive areas, such as residential uses. Furthermore, the Project would comply with LAMC Section 93.0117(b), which limits exterior lighting to no more than 2 foot-candles of lighting intensity on any property containing residential units.

[15] City of Los Angeles Department of City Planning, Ordinance No. 181,340, effective November 17, 2010.

d) Site Security

The Project would incorporate a security program to ensure the safety of Project residents, employees, and visitors. The buildings would include controlled access to the housing units and common open space areas, as well as to the hotel under the Project with the East Site Hotel Option. Access to commercial and restaurant uses, publicly accessible open space areas, and the paseo would be unrestricted during business hours. Facility operations would include staff training and building access. Project security would include provision of 24-hour video surveillance and full-time security personnel. Duties of the security personnel would include, but would not be limited to, assisting residents and visitors with site access; monitoring entrances and exits of buildings; managing and monitoring fire/life/safety systems; and patrolling at regular intervals on the Project Site. The Project design would also include lighting of entryways, publicly accessible areas, and common building and open space areas associated with the housing units and hotel rooms for security purposes.

Regarding public events in the open space plaza areas, following event completion and attendee dispersal, barricades would be placed on the stages, and regularly scheduled security patrols, as well as camera surveillance, would reduce the potential for undesirable activities within the publicly accessible open space.

e) Sustainability

(1) Project Sustainability Features

The Project has been designed to meet the standards for United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Gold Certification through proven and effective design strategies. Sustainable elements that have been included into the Project and the Project with the East Site Hotel Option are described below.

The Project Site's urban location enables the Project to earn LEED *Location and Transportation* credits related to public transit, bike usage, and EV charging stations. The Project Site would be readily accessible by several public transit options, including numerous City bus lines and rail at the Metro Red Line Hollywood/Vine Station. A Transportation Demand Management (TDM) Program would be implemented to reduce the Project's single occupant vehicle trips and increase the trips arriving via alternative modes of transportation (e.g., walking, bicycle, carpool, vanpool, and transit). The TDM Program would include design features, transportation services, education, and incentives intended to reduce the amount of single occupant vehicles during commuter peak hours. The TDM Program may include, but is not limited to, unbundled parking; daily parking discounts for Metro commuters; transit subsidies; upgrades or repairs to sidewalks

en-route to the Metro Red Line Hollywood/Vine Station; rideshare programs and parking; and an integrated pedestrian network within and adjacent to the Project Site that is transit-, bike-, and pedestrian-friendly. Additionally, the Project is required to provide on-site short and long-term bicycle parking on both the West and East Sites, located in consideration of the roadway network.

The Project would incorporate water conservation and rainwater management strategies, such as high efficiency water fixtures, graywater and rainwater capture systems, green roofs on the Senior Buildings and residential amenity decks, and water-permeable paving.

As part of a hybrid strategy to mitigate urban heat island effects, the Project would not include any uncovered at-grade parking. The Project would also employ light-colored, reflective paving materials, and roof and grade-level vegetation. All selected plant and tree species would be drought tolerant.

The Project is designed to exceed American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) 90.1-2010 standards by more than 20 percent through the use of efficient heating, ventilation, and air conditioning (HVAC) systems and a high-performance building envelope. Indoor air quality would be enhanced through the selection of low-volatile organic compound (VOC) emitting materials, and exhaust systems would be utilized for optimal ventilation in both kitchens and bathrooms.

Furthermore, the Project's on-site outdoor amenity spaces would contain multiple gardens and green spaces for both the public and residents to use. Last, the Project would comply with the City's requirements for tree planting to enhance the outdoor environment.

(2) Environmental Leadership Development Project

The Project has been certified by Governor Brown as an eligible project under the Jobs and Economic Improvement through Environmental Leadership Act of 2011 (AB 900). The Notice of Environmental Leadership Development Project (ELDP), dated August 17, 2018, was circulated in accordance with PRC Chapter 6.5 (commencing with Section 21178). AB 900, which is codified in PRC Sections 21178 through 21189.3, was intended to encourage California's economic recovery by providing a streamlined process for judicial review of compliance with CEQA for development projects that qualify as an ELDP. On August 16, 2018, Governor Brown certified that the Project meets the criteria set forth in the statute, including the applicable updated requirements in AB 246. In order to be certified as an ELDP, the Governor determined that the Project would result in a minimum investment of $100 million, would create high-wage jobs, and would not result in net additional greenhouse gas (GHG) emissions, as determined by the California Air Resources Board. Further, a mixed-use project, such as the Project, must meet

additional requirements. Specifically, it must be located on an infill site, be designed to achieve Leadership in Energy & Environmental Design (LEED) Gold certification, be consistent with the relevant regional sustainable communities strategy, and exceed by at least 15 percent the transportation efficiency for comparable projects. The Governor's certification determined that the Project complies with all of these applicable requirements. The Governor's certification and related documentation are provided in Appendix B of this Draft EIR.

(3) CEQA Streamlining

As discussed in Chapter I, *Introduction*, the Project qualifies for CEQA streamlining per SB 375 and PRC Section 21159.28. Accordingly, assessments of the following issues, as provided, within this Draft EIR are provided for informational purposes only: (1) Project-specific and cumulative impacts from cars and light-duty truck trips generated by the Project on global warming or the regional transportation network; (2) growth-inducing impacts; and (3) a reduced residential density alternative that addresses the effects of car and light-duty truck trips generated by the project. Refer to the SB 375 Technical Memorandum in Appendix C of this Draft EIR for a complete analysis of the Project's eligibility for CEQA streamlining.

f) Project Design Features

The above sections identify general characteristics of the Project upon which the analyses of this Draft EIR are based. In addition to these Project characteristics, the Applicant proposes to implement a number of Project Design Features (PDFs) that specifically relate to environmental considerations. The PDFs will be included in the Mitigation Monitoring Program required in association with certification of the EIR. The PDFs are presented in the Executive Summary of the Draft EIR, as well as in individual topical sections of the Draft EIR, where applicable. The PDFs are taken into account in the analysis of potential Project impacts provided in Chapter IV, *Environmental Analysis*, of this Draft EIR.

g) Construction Information

(1) Construction Schedule

Construction of the Project would begin as early as 2021 and commence on the West Site. Construction activities would occur Monday through Saturday from 7:00 A.M. to 3:00 P.M., consistent with City requirements regarding allowable construction hours. As shown below in **Table II-5**, *Project Construction Schedule,* construction on both the West and East Sites would include eight phases that could overlap (i.e., utilities/trenching could occur while site preparation is underway). Due

to the potential for phases to overlap, the overall construction duration is expected to be less than if each phase were added together.

TABLE II-5
PROJECT CONSTRUCTION SCHEDULE

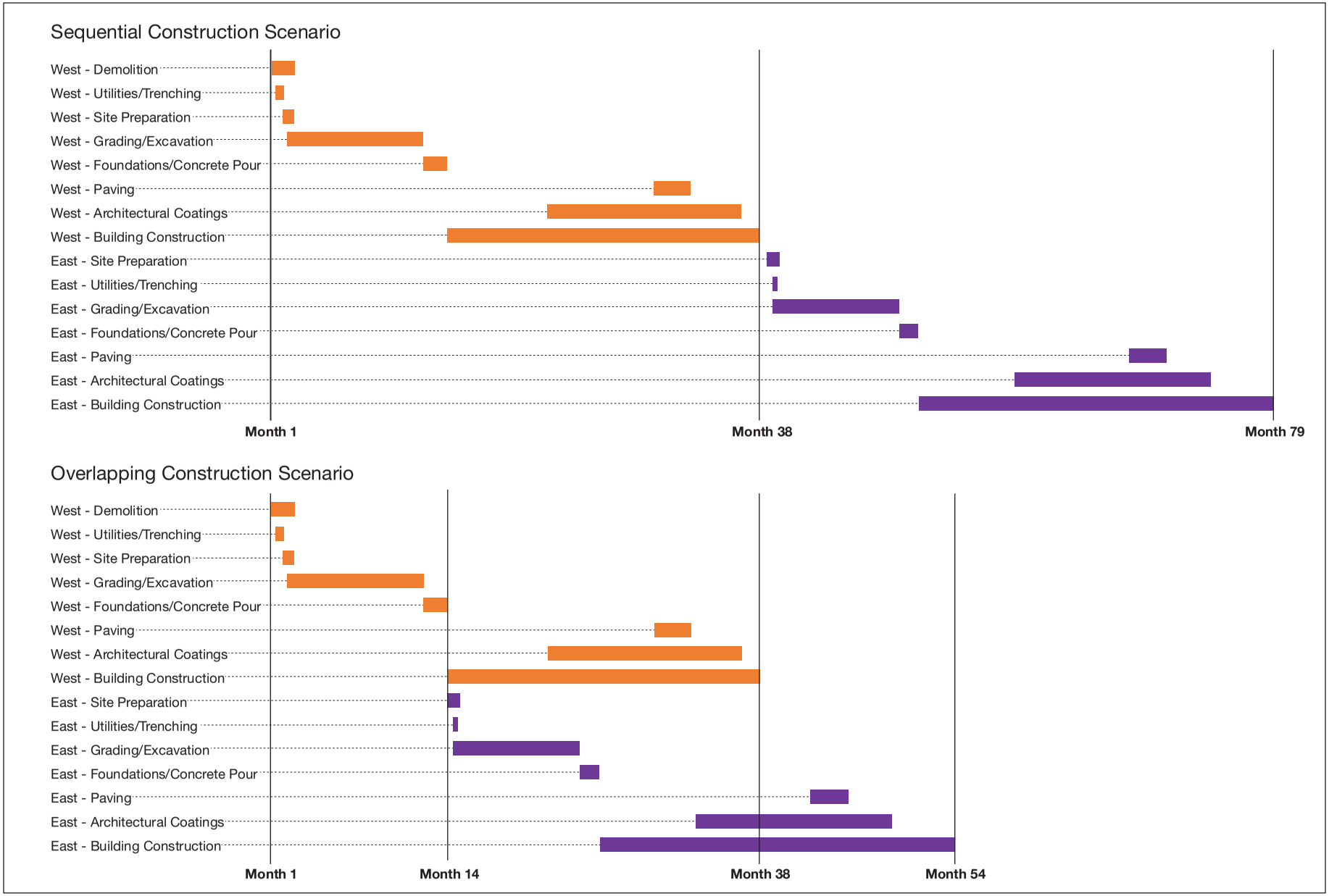
Construction Phase	Approximate Duration for West Site	Approximate Duration for East Site
Demolition	2 months	n/a
Utilities/Trenching	0.5 months	0.5 months
Site Preparation	1 month	1 month
Grading/Excavation	11 months	10 months
Foundations/Concrete Pour	2 months	1.5 months
Paving	3 months	3 months
Architectural Coatings	15.5 months	15.5 months
Building Construction	24.5 months	28 months

SOURCE: Handel Architects LLP, 2019 and James Corner Field Operations, 2019.

To allow for necessary flexibility in terms of construction scheduling, logistical site needs, and a conservative evaluation of potential construction-related environmental impacts, this Draft EIR considers two potential construction scenarios: a scenario where construction of the West and East Sites have some overlap ("overlapping construction scenario" with a shorter overall construction duration), and a scenario where construction of the West and East Sites are entirely separate, and have no overlap ("sequential construction scenario" with an extended construction duration).

The sequential and overlapping construction scenarios are shown graphically in **Figure II-30**, *Project Construction Scenarios*. In the overlapping construction scenario, the East Site's Site Preparation, Utilities/Trenching and Grading/Excavation phases would overlap construction activities on the with West Site starting with the West Site's Building Construction phase. There would be no overlap of the East Site construction during grading/excavation of the West Site. In the overlapping construction scenario, construction could be completed in approximately 4.5 years (beginning 2021 and completed in 2025). In the sequential construction scenario in which the two sites are built one after another with no overlap, construction of the Project would be completed in under approximately seven years (beginning in 2021 and completed in 2027).[16] In either scenario, buildout of the West Site is anticipated to be in 2024.

[16] These scenarios are reflected in each of the environmental sections in Chapter IV, *Environmental Analysis*, of this Draft EIR, in which the duration of construction is one of the factors in determining impacts.



SOURCE: ESA, 2020

Hollywood Center Project

Figure II-30
Project Construction Scenarios

The Applicant has requested to enter into a 20-year term Development Agreement with the City. Although the Applicant expects to construct the Project prior to the expiration of the Development Agreement, as identified above, the Applicant would have the legal ability to develop the Project through 2040. Accordingly, where 2040 conditions would be the worst case scenario, a 2040 buildout is assumed and utilized in this Draft EIR. However, 2040 conditions would be the worst-case scenario for the analysis of noise impacts only. For all other issue areas, in which impacts are quantified, including air quality, energy, and greenhouse gas emissions, either the overlapping construction scenario with an anticipated buildout year of 2025, or the sequential construction scenario with an anticipated buildout year of 2027, is assumed.

(2) Construction Overview

Project construction would require grading and excavation activities on both the West and East Sites, down to a maximum depth of 82 feet below existing grade for building foundations and five levels of subterranean parking, which would generate truck trips associated with the export of approximately 542,300 cubic yards of soil from the Project Site. Additional construction trips from the daily commute of construction workers, as well as materials delivery, would be generated. All construction staging activities would be located within the West and/or East Sites. No import of soil, additional staging or use of off-site areas is proposed).

Portions of the Hollywood Walk of Fame, a City of Los Angeles Historic-Cultural Landmark, that runs along both sides of Vine Street from Yucca Street, and fronting the Project Site, could be affected during construction due to the presence of heavy construction equipment and high levels of construction activity. In accordance with required procedures for alterations to the Walk of Fame, and in coordination with the Hollywood Chamber of Commerce / Hollywood Historic Trust and the Department of Public Works Bureau of Engineering, where stars or parts of the sidewalk cannot be protected in place, the locations would be recorded and the stars temporarily removed, crated, and stored in an approved secured location. Once necessary construction work is completed, the stars would be replaced and restored in an appropriate manner in their original location with matching terrazzo.

(3) Construction Haul Route

Project construction would include the use of two haul route options to and from the Project Site. The first outbound haul route option would include travel along Ivar Avenue to Yucca Street from the West Site; or Vine Street to Yucca Street from the East Site. Outbound trucks would then travel east on Yucca Street, north on Argyle Avenue, and enter the US-101 southbound on-ramp just north of Yucca Street. Inbound trucks heading north on US-101 would take the Gower Street off-

ramp, head south on Gower Street, west on Yucca Street, and south on Vine Street for the West Site or south on Ivar Street for the East Site.

The second haul route option for outbound trips would include travel south along Ivar Avenue to Hollywood Boulevard from the West Site; or south along Vine Street to Hollywood Boulevard from the East Site. Outbound trucks would then travel east on Hollywood Boulevard and enter the US-101 southbound on-ramp. Inbound trucks heading north or south on US-101 would take the Hollywood Boulevard off-ramp, head west on Hollywood Boulevard, and north on Ivar Street for the West Site or north on Vine Street for the East Site.

These haul routes may be modified in compliance with City policies, provided LADOT and/or the Department of Street Services approves any such modification.

8. Anticipated Project Approvals

Discretionary entitlements, reviews, and approvals required for implementation of the project would include, but not necessarily be limited to, the following:

1. Pursuant to LAMC Section 12.32 F & Q, a Vesting Zone Change from C4-2-SN to C2-2-SN.
2. Pursuant to LAMC Section 12.32 F, a Height District Change for the Project Site to remove the D Limitation to allow a 7.0:1 FAR.
3. Pursuant to LAMC Section 11.5.11(e) and California Government Code Section 65915(k) or the Applicable Housing Incentive Program, one (1) incentive, concession, reduction, or modification of zoning code requirements to provide for affordable housing costs as follows:
   - A floor area bonus (35 percent from 6:1 FAR base) to allow additional floor area up to 7:1 FAR; and
   - The floor area of any residential balconies and terraces may be excluded for purposes of calculating the buildable floor area.
4. Pursuant to LAMC Section 12.24 W.1, a Master Conditional Use Permit for the sale or dispensing of alcoholic beverages for on-site and off-site consumption within 12 establishments.
5. Pursuant to LAMC Section 12.24 W.19, a Conditional Use Permit for a unified development to allow Floor Area Ratio (FAR) averaging and residential density transfer between the East and the West Sites.
6. Pursuant to LAMC Section 16.05, Site Plan Review for a development that results in an increase of 50 or more dwelling units and/or guest rooms or generates more than 1,000 average daily trips.
7. Pursuant to LAMC Section 17.15, a Vesting Tentative Tract Map No. 82152 to allow the merger of 16 existing lots and the subsequent re-subdivision of a 4.613-acre site into three (3) ground lots and 35 airspace lots for a total of 38

lots; the merger of an alley to add 1,313 square feet to the Project Site and portions along the sidewalk of Yucca Street and both sides of Vine Street to add 5,163 square feet to the Project Site; an associated haul route for the export of 542,300 cubic yards of soil; and the removal of 16 street trees.

8. Pursuant to California Government Code Sections 65864 through 65869.5, a Development Agreement between the Applicant and the City of Los Angeles (anticipated to extend through 2040).

In addition to the entitlements identified above, permits are also required from other City entities for the Project, including, but not limited to, permits from the City's Bureau of Engineering for approval of the median along Vine Street and the City's Department of Building and Safety and Public Works (and other municipal agencies) for Project construction activities, such as demolition, haul route, excavation, shoring, grading, foundation, building and interior improvements, and the removal and replacement of trees on public and/or private property. Beyond the environmental requirements being carried out in association with this EIR, to the extent known there are no other related federal, state or local environmental review and consultation requirements that need to be integrated with this CEQA review.

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III. Environmental Setting

A. Overview of Environmental Setting

1. Overview of Environmental Setting

CEQA Guidelines Section 15125 requires that an Environmental Impact Report (EIR) include a description of the existing physical environment. This chapter provides a general overview of the existing regional and local setting in which the Project Site is located and a brief description of the existing conditions at the Project Site. Detailed information on existing conditions for each environmental topic is provided in Chapter IV, *Environmental Impact Analysis*, of this Draft EIR. This chapter also provides an overview of other potential reasonably foreseeable projects (i.e., related projects) in the vicinity of the Project Site that the City of Los Angeles (City) has determined could potentially result in cumulative impacts and are considered as part of the cumulative impacts analysis.

a) On-Site Conditions

The Project Site is located in the Hollywood Community Plan area of the City. The Project Site is generally bounded by Yucca Street on the north, Ivar Avenue on the west, Argyle Avenue on the east, and Hollywood Boulevard on the south, and is bifurcated by Vine Street. The portion of the Project Site located between Ivar Avenue and Vine Street is identified as the "West Site" and the portion located between Vine Street and Argyle Avenue is identified as the "East Site." The Project Site encompasses 10 parcels and multiple lots totaling approximately 194,495 gross square feet or 4.46 acres.

The Project Site is entirely developed and is used primarily for surface parking and storage (no educational/Campus activities/classes), with the exception of the historic Capitol Records Complex. The northern part of the West Site contains an approximately 1,237-square-foot, building constructed in 1978, that is currently leased by the American Musical and Dramatic Academy (AMDA) and used on a daily basis for storage of sets and props. The remaining part of the West Site (approximately 77,392 square feet) contains a surface parking lot with a parking attendant kiosk. There are currently six curb cuts on the West Site and six curb cuts on the East Site (12 total) along the Project frontage. The entire West Site is enclosed by iron fencing and secured by a lockable gate.

The East Site contains the Capitol Records Complex, which includes the 13-story Capitol Records Building and ancillary studio recording uses (92,664 square feet) and the two-story Gogerty Building (21,639 square feet), totaling approximately

114,303 square feet of existing floor area. The Capitol Records Building, which reaches a height of approximately 165 feet above grade, was built in 1956 and is the visual focal point of the Project Site. The adjacent Gogerty Building, which reaches a height of approximately 33 feet above grade, was built in 1930 and subsequently renovated in 2003 and. Both buildings within the Capitol Records Complex are considered historical resources under the California Environmental Quality Act (CEQA), which would not be directly altered by the Project.

The remaining part of the East Site (approximately 91,250 square feet) contains three surface parking lots that currently provide a total of 203 parking spaces. The surface parking lot adjacent to the east of the Capitol Records Building is controlled by gate access. The surface parking lot immediately south of the Capitol Records Building is a public paid lot with a parking attendant kiosk. Existing access to the East Site is provided from three driveways along Vine Street, a secure attended driveway on Yucca Street, two driveways on Argyle Avenue.

The West and East Sites slope down from northeast to southwest with elevations ranging from about 404 feet elevation to 383 feet elevation (i.e., a grade change of approximately 21 feet). The Project Site is developed almost entirely with impervious surfaces.

The sidewalk along Vine Street adjacent to the Project Site contains a portion of the Hollywood Walk of Fame, a City of Los Angeles Historic-Cultural Monument, and street trees. The Project Site currently contains 48 trees, 14 of which are considered significant trees. In addition, there are 16 trees which are City rights-of-way trees. No existing housing or other commercial uses are located on the Project Site.

The City's 1998 Hollywood Community Plan land use designation for the Project Site is Regional Center Commercial with an underlying zoning designation of C4-2D-SN. The Project Site is also designated as Regional Center Commercial under the Hollywood Redevelopment Plan, which establishes a 4.5:1 FAR limitation, or a maximum 6:1 FAR with City Planning Commission approval.

The Project Site is located within a Southern California Association of Governments (SCAG)-designated High Quality Transit Area (HQTA) as it is located 600 feet north of the Los Angeles County Metropolitan Transportation Authority (Metro) Red Line Hollywood/Vine Station.[1] Given proximity to the Metro Red Line Hollywood/Vine Station and other regional-serving transportation facilities, the Project also falls within a City Transit Priority Area (TPA).

[1] Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, Exhibit 5.1, p. 77.

b) Surrounding Uses

The Project Site is within a part of the Regional Center of Hollywood that is urbanized and generally built out. The land uses in the vicinity of the Project Site are comprised primarily of neighborhood-serving commercial, tourist and entertainment-related commercial uses, offices, hotels, low- to high-density residential developments, and low- to medium-intensity industrial uses that vary in building style and period of construction.

Adjacent development to the north of the Project Site, starting from the northwest corner of the West Site, is a two-story residential building. Immediately north of the West Site bordering the south side of Yucca Street is a five-story mixed-use building currently occupied by AMDA (the AMDA Vine Building). On the north side of Yucca Street is and eight-story building that is also currently occupied by AMDA (the AMDA Tower Building). On the northwest corner of Yucca Street and Argyle Avenue is the Los Angeles Department of Water and Power (LADWP) Distribution Station No. 52. Immediately adjacent to the East Site on the southwest corner of Yucca Street and Argyle Avenue is a recently constructed 18-story, 114-unit mixed-use residential building (Argyle House) at 6226 Yucca Street. At the northeast corner of Yucca Street and Argyle Avenue is the 15-story, 216-room Kimpton Everly Hotel at 1800 Argyle Avenue.

To the east of the Project Site across Argyle Avenue, from north to south, there are two-story multi-family residential uses, a vacant, fenced-off property, and the seven-story, 507-unit Eastown mixed-use residential building has been developed at 6201 Hollywood Boulevard.

To the south of the East Site are a single-story restaurant, surface parking, and the three-story Hollywood Pantages Theatre. Further to the south at the northeast corner of Hollywood Boulevard and Vine Street is the 12-story Equitable Building, which includes residential uses and a ground floor restaurant/bar.

The structures directly west of the Project Site on the west side of Ivar Avenue include two, three-story multi-family buildings and various retail, restaurant, and service uses. South of the West Site on the west side of Vine Street is the Avalon Theater Building, and south of the theater on Vine Street is the five-story h Club LA. Also south of the West Site and northeast of Ivar Avenue and Hollywood Boulevard is an 11-story, U-shaped Knickerbocker Building currently used for senior apartment housing (former Knickerbocker Hotel) and south of that is the 14-story L. Ron Hubbard Scientology Building (Scientology Building). In general, the land uses within the vicinity of the Project Site are primarily characterized by a mix of low- to medium-intensity residential, commercial, and mixed-use buildings, which vary in building style and period of construction.

c) Existing Transportation System

The Hollywood Freeway (US-101), which is approximately 380 feet north of the East Site's northernmost boundary; the Santa Monica Freeway (I-10), which is approximately five miles to the south; the Harbor Freeway (I-110), which is approximately five miles to the southeast; and the Golden State/Santa Ana Freeway (I-5), which is approximately five miles to the east; the Ventura Freeway (SR-134), which is approximately four miles to the north; and the San Diego Freeway (I-405), which is approximately eight miles to the southwest.

The Project Site is well-served by a network of regional transportation facilities. Various public transit stops operated by Metro and Los Angeles Department of Transportation (LADOT) are located in close proximity to the Project Site (see Figure II-4 of Chapter II, *Project Description*, of this Draft EIR. The nearest Metro Station is the Metro Red Line Hollywood/Vine Station located approximately 600 feet south of the Project Site. Bus transit access is provided along a number of Metro and LADOT bus routes with multiple stops located within one block of the Project Site. These bus routes include Metro Rapid Line 780, Metro Local Lines 180/181, 207, 210, 212/312, 217, and 222, and LADOT Downtown Area Short Hop (DASH) Hollywood, DASH Beachwood Canyon, and DASH Hollywood/Wilshire.

Maps and aerial photos depicting the Project Site and surrounding uses are provided in Chapter II, *Project Description*, of this Draft EIR.

d) Existing Conditions

Detailed descriptions of the environmental setting relevant to each of the environmental topics evaluated in this Draft EIR have been prepared and are included in Chapter IV, *Environmental Impact Analysis*, in Sections IV.A through IV.O, of this Draft EIR.

e) Land Use Plans

City land use plans applicable to the Project Site include the City of Los Angeles General Plan; the Hollywood Community Plan; and the Hollywood Redevelopment Plan.[2] Regional plans that are applicable to the Project Site include SCAG's 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS), the South Coast Air Quality Management District's (SCAQMD) 2016 Air Quality Management Plan (AQMP), and the Metro's 2010 Congestion Management Plan (CMP).

[2] Although CRAs have been dissolved, adopted redevelopment plans are still in effect.

2. Related Projects

CEQA Guidelines Section 15130 requires that the EIR discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable. Cumulative impacts are defined in Section 15355 of the CEQA Guidelines as "an impact which is created as a result of the combination of a project evaluated in the EIR together with other projects causing related impacts." As identified in CEQA Guidelines Section 15130(b), the discussion of cumulative impacts shall "reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone."

Either of the following is necessary to conduct an adequate analysis of cumulative impacts:

- A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or
- A summary of projections contained in an adopted local, regional, or Statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect.

Consistent with CEQA Guidelines Section 15130(b)(3), the City has determined in its independent judgement, based on the size and scale of the Project analysis and related projects in the area, two miles is the appropriate radius applied for the identification of related projects for this Project. This distance includes a portion of the City of West Hollywood and known development projects in the Hollywood and neighboring areas of the City. LADOT's approach for identifying related projects is to extend one-quarter mile radius of the project site.[3] Applying this approach results in a radius of approximately 1.55 miles from the Project Site. To provide a conservative analysis and recognizing that a number of projects are proposed throughout the study area, a radius of two miles extends approximately three-quarters of a mile beyond the furthest study location.

A review of the two-mile radius for related projects revealed that, due to the study area street network and natural topography, the two-mile distance encompasses approximately 147 known projects (120 in the City of Los Angeles and 27 in the City of West Hollywood), that may potentially contribute to cumulative impacts. Reviewing the scale of these projects, the street network, and topography surrounding the study area is a consideration for looking further north along US-101 such that southbound trips from the Universal City area are directed through the Cahuenga Pass on US-101 and Cahuenga Boulevard and, thus, through the Project's transportation study area. Following this logic, projects along US-101

[3] City of Los Angeles Department of Transportation, Transportation Assessment Guidelines (TAG), July 2019.

north of the Project Site, were reviewed to identify those that are directly upstream from the Project Site and large enough that exclusion from the related project list would be unreasonable. To provide a conservative analysis, three additional projects were added to the analysis due to the aggregate size of the projects. These three projects are proposed as a part of the NBC Universal Evolution Plan at Universal City, the Universal City Hilton hotel expansion, and the Sheraton hotel expansion (although the Sheraton Hotel has officially withdrawn its entitlement application), are included in the related projects list, despite these specific three projects being beyond the two-mile radius, resulting in a total of 150 identified related projects.

The list of 150 identified related projects is provided in **Table III-1**, *Related Projects List*, with the locations of each of the related projects presented in **Figure III-1**, *Related Projects Map*. Of the 150 related projects, 123 are located within the City of Los Angeles, and 27 are located within the City of West Hollywood. Although the projects listed in Table III-1 serve as the primary basis for evaluation of cumulative impacts, the individual projects considered may from one environmental issue to the next as the geographic context of certain issue areas varies. The cumulative analysis for each environmental issue, including a discussion regarding the identification of relevant related projects, is provided in each environmental section in Chapter IV, *Environmental Impact Analysis*, of this Draft EIR.

TABLE III-1
RELATED PROJECTS LIST

Project	Project Address	Land Use	Size	Unit
City of Los Angeles				
1	6230 W. Yucca Street	Office	13.4	ksf
		Apartments	108.0	du
		Work Space	6.2	ksf
		Live-work space	8.0	du
2	1718 N. Vine Street	Hotel	216.0	rooms
		Restaurant	4.4	ksf
3	1800 N. Argyle Avenue	Hotel	225.0	rooms
4	6220 W. Yucca Street	Apartments	191.0	du
		Hotel	260.0	rooms
		Retail	7.0	ksf
5[a]	6225 W. Hollywood Boulevard	Office	214.0	ksf

TABLE III-1
RELATED PROJECTS LIST

Project	Project Address	Land Use	Size	Unit
6	6200 W. Hollywood Boulevard	Apartments	952.0	du
		Retail	190.8	ksf
7	6381 W. Hollywood Boulevard	Hotel	80.0	Other
		Restaurant	15.3	ksf
8	6140 Hollywood Boulevard	Condominiums	27.0	du
		Hotel	102.0	rooms
		Retail	11.5	ksf
9	1601 N. Vine Street	Office	121.6	ksf
10	6100 W. Hollywood Boulevard	Apartments	209.0	du
		Apartments	11.0	du
		Quality Restaurant	3.3	ksf
11	1723 N. Wilcox Avenue	Apartments	68.0	du
		High-Turnover Restaurant	3.7	ksf
12	1717 N. Wilcox Avenue	Hotel	140.0	rooms
		Retail	3.5	ksf
13	6436 W. Hollywood Boulevard	Apartments	220.0	du
		Retail	8.8	ksf
14	1546 N. Argyle Avenue	Apartments	276.0	du
		Retail	9.0	ksf
		High-Turnover Restaurant	15.0	ksf
		Supermarket	27.0	ksf
15	1540 N. Vine Street	Apartments	306.0	du
		Retail	68.0	ksf
16	1615 N. Cahuenga Boulevard	Restaurant	10.3	ksf
17	1921 N. Wilcox Avenue	Apartments	150.0	rooms
		Restaurant/Lounge	3.5	ksf
18	6506 Hollywood Boulevard	Drinking Place	12.3	ksf
		Restaurant	745.0	ksf
19	6523 W. Hollywood Boulevard	Office	4.1	ksf
		Restaurant	10.4	ksf
20	6417 W. Selma Avenue	Hotel	182.0	rooms

TABLE III-1
RELATED PROJECTS LIST

Project	Project Address	Land Use	Size	Unit
21	6421 W. Selma Avenue	Quality Restaurant	20.6	ksf
		Retail	6.0	ksf
22	6421 W. Selma Avenue	Hotel	114.0	rooms
		Rooftop Restaurant/bar	5.0	ksf
		Ground Floor Restaurant	1.8	ksf
23	1525 N. Cahuenga Boulevard	Hotel	64.0	rooms
		Office	1.5	ksf
		Rooftop Bar	0.7	ksf
24	6250 Sunset Boulevard	Apartments	200.0	du
		Retail	4.7	ksf
25	6201 W. Sunset Boulevard	Apartments	731.0	du
		Sit-Down Restaurant	5.0	ksf
		Retail	8.0	ksf
		Coffee Shop	1.0	ksf
		Retail	13.0	ksf
		Coffee Shop	1.0	ksf
26	1719 Whitley Street	Hotel	156.0	rooms
27	6516 W. Selma Avenue	Hotel	212.0	rooms
		Café	2.3	ksf
		Courtyard Lounge/Bar	5.3	ksf
		Rooftop Bar/Lounge	5.8	ksf
28	6230 W. Sunset Boulevard	Apartments	200.0	du
		Office	13.5	ksf
		Office	13.5	ksf
		Office	5.1	ksf
		Retail	4.7	ksf
29	6409 W. Sunset Boulevard	Hotel	275.0	rooms
		Retail	1.9	ksf
30	1541 N. Wilcox Avenue	Hotel	190.0	rooms
		Restaurant	4.5	ksf
		Banquet/Meeting Rooms	1.4	ksf

TABLE III-1
RELATED PROJECTS LIST

Project	Project Address	Land Use	Size	Unit
31	6200 W. Sunset Boulevard	Apartments	270.0	du
		Quality Restaurant	2.5	ksf
		High-Turnover Restaurant	7.5	ksf
		Pharmacy with Drive-Thru	2.5	ksf
32	6121 W. Sunset Boulevard	Apartments	200.0	du
		Office	422.5	ksf
		High-Turnover Restaurant	23.5	ksf
		Fast Food Restaurant	2.0	ksf
		Retail	16.5	ksf
		Health Club	15.0	ksf
33	1600 N. Schrader Boulevard	Hotel	198.0	rooms
		Bar/Lounge	2.4	ksf
		Restaurant	3.6	ksf
34	6611 W. Hollywood Boulevard	Hotel	167.0	rooms
		Retail	10.5	ksf
		High-Turnover Restaurant	5.4	ksf
		Quality Restaurant	4.0	ksf
		Theater	1.6	ksf
35	6608 W. Hollywood Boulevard	Quality Restaurant	11.4	ksf
		Spec Events	6.1	ksf
		Bar/Lounge	9.4	ksf
		Office	3	ksf
36	6400 W. Sunset Boulevard	Apartments	200.0	du
		High-Turnover Restaurant	4.0	ksf
		Restaurant	3.0	ksf
37	6050 Sunset Boulevard	Other	169.4	ksf
		Other	52.8	ksf
		Office	859.4	ksf
38	1717 N. Bronson Avenue	Apartments	89.0	du
39	6650 W. Franklin Avenue	Apartments	68.0	du

TABLE III-1
RELATED PROJECTS LIST

Project	Project Address	Land Use	Size	Unit
40	6007 Sunset Boulevard	Residential	146.0	du
		Retail	7.5	ksf
		Restaurant	7.5	ksf
41	1360 N. Vine Street	Apartments	429.0	du
		Grocery Store	55.0	ksf
		Retail	5.0	ksf
		High-Turnover Restaurant	9.0	ksf
42	6322 De Longpre Avenue	Office	223.7	ksf
		Apartments	250.0	du
		Retail	33.0	ksf
		Restaurant	9.1	ksf
43	1400 N. Cahuenga Boulevard	Hotel	220.0	rooms
		Restaurant	27.2	ksf
		Lounge/Bar	1.4	ksf
44	1718 N. Las Palmas Avenue	Apartments	195.0	du
		Condominiums	29.0	du
		Retail	1.0	ksf
45	5939 W. Sunset Boulevard	Apartments	299.0	du
		Office	38.4	ksf
		Retail	7.7	ksf
		Park	19.0	ksf
46	1603 N. Cherokee Avenue	Apartments	66.0	du
47	1749 N. Las Palmas Avenue	Apartments	71.0	du
48	1341 Vine Street	Hotel	100.0	rooms
		Office	282.5	ksf
		Apartments	250.0	du
49	1313 N. Vine Street	Museum	44.0	ksf
		Storage	35.2	ksf
50	5901 W. Sunset Boulevard	Retail	26.0	ksf
		Office	274.0	ksf
51	1601 N. Las Palmas Avenue	Apartments	86.0	du

TABLE III-1
RELATED PROJECTS LIST

Project	Project Address	Land Use	Size	Unit
52	1824 N. Highland Avenue	Apartments	118.0	du
53	1311 Cahuenga Boulevard	Apartments	375.0	du
		Retail	2.5	ksf
54	6758 W. Yucca Street	Apartments	270.0	du
		Retail	8.5	ksf
55	6751 Hollywood Boulevard	Hotel	262.0	rooms
56	1841 N. Highland Avenue	Hotel	100.0	rooms
57	1915 Highland Avenue	Café and Market	18.0	ksf
58	1310 N. Cole Avenue	Apartments	375.0	du
		High-Turnover Restaurant	2.5	ksf
59	6757 W. Hollywood Boulevard	Restaurant	17.7	ksf
60	6701 W. Sunset Boulevard	Apartments	760	du
		Condominiums	190.0	du
		Hotel	308.0	rooms
		Office	95.0	ksf
		Shopping Center	61.8	ksf
		Supermarket	40.0	ksf
		Quality Restaurant	41.6	ksf
		High-Turnover Restaurant	41.6	ksf
61	5750 W. Hollywood Boulevard	Apartments	161.0	du
		Retail	6.0	ksf
62	5800 W. Sunset Boulevard	Office	535.4	ksf
63	1610 N. Highland Avenue	Apartments	248.0	du
		Retail	12.8	ksf
64	1133 N. Vine Street	Hotel	112.0	rooms
65	1149 N. Gower Street	Apartments	21.0	du
		Townhomes	36.0	du
66	Over US-101 between Hollywood Boulevard and Santa Monica Boulevard	Central Park	38.0	ac
		Amphitheater	500.0	seat
		Offices/Concessions	7.5	ksf
		Commercial	7.5	ksf

TABLE III-1
RELATED PROJECTS LIST

Project	Project Address	Land Use	Size	Unit
		Restaurant	21.5	ksf
		Café	0.8	ksf
		Bed & Breakfast Inn	5.0	rooms
		Community Center	30.0	ksf
67	1717 Gramercy Place	Students	350.0	stu
68	1411 N. Highland Avenue	Apartments	76.0	du
		Retail	2.5	ksf
69	5600 W. Hollywood Boulevard	Hotel	80.0	rooms
70	5606 Harold Street	Apartments	54.0	du
71	5632 W. De Longpre Avenue	Apartments	185.0	du
72	7046 Hollywood Boulevard	Apartments	42.0	du
73	5627 Fernwood Avenue	Affordable housing	59.0	du
74	1233 N. Highland Avenue	Apartments	72.0	du
		Retail	17.8	ksf
75	1745 N. Western Avenue	Mixed Use	53.9	ksf
		Retail	5.7	ksf
76	5500 W. Hollywood Boulevard	Quality Restaurant	4.6	ksf
		High-Turnover Restaurant	1.0	ksf
		Banquet Hall	9.8	ksf
77	5550 W. Hollywood Boulevard	Residential	278	du
		Retail	12.5	ksf
78	2580 Cahuenga Boulevard	Theatre	195.0	rooms
		Restaurant	19.5	ksf
		Hiking Train	1.5	ksf
		Office	30.0	employees
79	1657 N. Western Avenue	Apartments	91.0	du
		Retail	39.4	ksf
		Office	25.9	ksf
		Senior Housing	16.0	du
80	5525 W. Sunset Boulevard	Apartments	293.0	du
		High-Turnover Restaurant	2.2	ksf

TABLE III-1
RELATED PROJECTS LIST

Project	Project Address	Land Use	Size	Unit
		Fast Food Restaurant	1.0	ksf
		Grocery Store	25.1	ksf
		Retail	4.7	ksf
		Office	1.0	ksf
81	6300 W. Romaine Street	Office	114.7	ksf
		Other	40.9	ksf
		Studio	38.1	ksf
82	5520 W. Sunset Boulevard	Target/Discount Store	163.9	ksf
		Shopping Center	30.9	ksf
83	1868 N. Western Avenue	Apartments	87.0	du
		Retail	6.0	ksf
84	6677 W. Santa Monica Boulevard	Apartments	695.0	du
		Restaurant	4.0	ksf
		Coffee Shop/Juice Bar	5.5	ksf
		Retail	15.4	ksf
85	NWC Sunset & Western	Grocery	29.2	ksf
		Restaurant	3.0	ksf
		Retail	1.3	ksf
		Apartments	247.0	du
86	1118 N. McCadden Place	Senior Housing	100.0	du
		Youth Housing	92.0	du
		Office	17.0	ksf
		Youth and Senior Center	29.7	ksf
87	6601 W. Romaine Street	Office	104.2	ksf
		Storage	2.0	ksf
88	956 N. Seward Street	Office	130.0	ksf
89	959 N. Seward Street	Office	237.6	ksf
90	7107 W. Hollywood Boulevard	Apartments	410.0	du
		Retail	5.0	ksf
		Restaurant	5.0	ksf
91	7120 W. Sunset Boulevard	Apartments	44.0	du
		Restaurant	2.9	ksf

TABLE III-1
RELATED PROJECTS LIST

Project	Project Address	Land Use	Size	Unit
92	5420 W. Sunset Boulevard	Apartments	735.0	du
		Retail	59.1	ksf
		Retail	36.7	ksf
93	901 N. Vine Street	Apartments	76.0	du
		Restaurant	3.0	ksf
94	1350 N. Western Avenue	Mixed Use	204.0	du
		Retail	7.3	ksf
		Restaurant	7.0	ksf
95	5661 W. Santa Monica Boulevard	Apartments	437.0	du
		Retail	377.9	ksf
96	6901 W. Santa Monica Boulevard	Apartments	231.0	du
		Restaurant	5.0	ksf
		Retail	10.0	ksf
97	5460 W. Fountain Avenue	Apartments	75.0	du
98	6914 W. Santa Monica Boulevard	Condominiums	374.0	du
		Retail	15.0	ksf
99	7219 W. Sunset Boulevard	Hotel	93.0	rooms
		Restaurant	2.8	ksf
100	7300 W. Hollywood Boulevard	Temple	Temple Renovation	
101	927 N. Highland Avenue	School	100.0	enrollment
		Tutoring Center	18.0	employees
102	7007 W. Romaine Avenue	Office	50.0	ksf
		Retail	3.6	ksf
103	859 N. Highland Avenue	Coffee/Donut With Drive-Thru	0.8	ksf
104	733 N. Hudson Avenue	Apartments	46.0	du
105	712 N. Wilcox Avenue	Apartments	100.0	du
106	707 N. Cole Avenue	Apartments	84.0	du
107	5555 W. Melrose Avenue	Sound Stage	21.0	ksf
		Stage Support	1.9	ksf
		Production Office	635.5	ksf
		General Office	638.1	ksf

TABLE III-1
RELATED PROJECTS LIST

Project	Project Address	Land Use	Size	Unit
		Retail	64.2	ksf
		Studio	3,234.4	ksf
108	5570 W. Melrose Avenue	Apartments	52.0	du
		Retail	5.5	ksf
109	926 Sycamore Avenue	Retail	15.0	ksf
		Office	74.2	ksf
110	936 N. La Brea Avenue	Office	33.2	ksf
		Retail	19.9	ksf
111	925 N. La Brea Avenue	Retail	15.3	ksf
		Office	46.5	ksf
112	904 N. La Brea Avenue	Apartments	169.0	du
		Retail	40.0	ksf
113	2864 N. Cahuenga Boulevard	Apartments	300.0	du
114	5245 Santa Monica Boulevard	Apartments	32.0	du
115	7510 W. Sunset Boulevard	Apartments	236.0	du
		Retail	30.0	ksf
116	6915 Melrose Avenue	Condominiums	13.0	du
		Retail	7.5	ksf
117	525 Wilton Place	Apartments	88.0	du
118	4900 W. Hollywood Boulevard	Apartments	200.0	du
		Retail	25.0	ksf
119	7002 Clinton Street	School	4.5	ksf
120	1300 N. Vermont Avenue	Medical center	134.8	ksf
121	Hilton Universal City	Hotels	395.0	rooms
		Restaurant	8.5	ksf
		Meeting Space	15.0	ksf
		Spa	10.0	ksf
122	Universal Sheraton	Hotel	551	rooms
123	NBC Universal	Studio	307.9	Ksf
		Studio Offices	647.3	ksf
		Office	495.4	ksf

TABLE III-1
RELATED PROJECTS LIST

Project	Project Address	Land Use	Size	Unit
		Entertainment	337.9	ksf
		Entertainment Retail	39.2	ksf
		Hotel	900.0	ksf
City of West Hollywood				
1	1222 N. La Brea Avenue	Apartments	187.0	du
		Retail	19.6	ksf
2	1201 La Brea Avenue	Restaurant	4.6	ksf
3	1251 Detroit Street	Apartments	5.0	du
4	1221 Detroit Street	Condominiums	10.0	du
5	1201 Detroit Street	Condominiums	10.0	du
6	1141 Detroit Street	Condominiums	5.0	du
7	1227 Formosa Avenue	Apartments	5.0	du
8	1139 Detroit Street	Condominiums	5.0	du
9	7113 W. Santa Monica Boulevard	Apartments	184.0	ksf
		Commercial	13.4	ksf
10	1040 N. La Brea Avenue	Restaurant	5.2	ksf
		Residential	8.0	du
		Hotel	91.0	rooms
11	1125 Detroit Street	Apartments	22.0	du
12	1159 Formosa Avenue	Apartments	5.0	du
13	7143 Santa Monica Boulevard	Apartments	166.0	du
		Retail	9.3	ksf
14	1123 Formosa Avenue	Condominiums	5.0	du
15	1041 Formosa Avenue (The Lot)	Office/ Media Workshop	568.1	ksf
16	1052 Martel Avenue	Condominiums	5.0	du
17	1016 Martel Avenue	Apartments	11.0	du
18	1035 Vista Street	Townhome	4.0	du
19	1027 Gardner Street	Condominiums	5.0	du
20	1030 Sierra Bonita Avenue	Condominiums	5.0	du
21	1236 Spaulding Avenue	Apartments	3.0	du
22	1009 Gardner Street	Condominiums	6.0	du
23	1017 Sierra Bonita Avenue	Condominiums	5.0	du

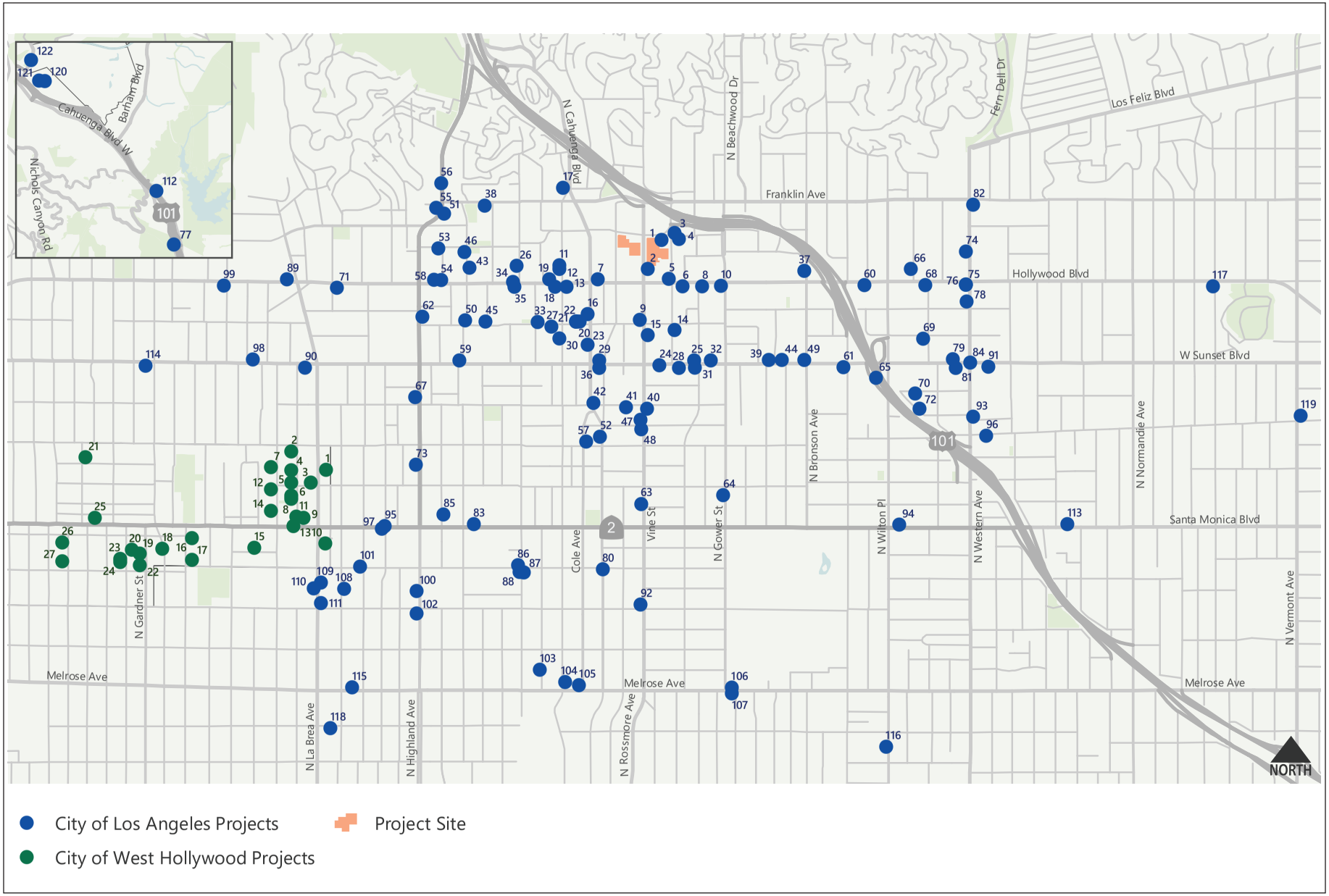
TABLE III-1
RELATED PROJECTS LIST

Project	Project Address	Land Use	Size	Unit
24	1011 Sierra Bonita Avenue	Condominiums	5.0	du
25	7617 Santa Monica Boulevard	Residential	71.0	du
		Retail	4.8	ksf
		Restaurant	4.4	ksf
26	1041 Spaulding Avenue	Condominiums	14.0	du
27	1013 Spaulding Avenue	Condominiums	5.0	du

ksf = thousand square feet; du = dwelling units; ac = acres; stu = students

a Related Project No. 5, located at 6225 Hollywood Boulevard, was terminated by the Department of City Planning via a Notice of Termination on December 31, 2012. This related project will be quantitatively evaluated in the Draft EIR to be conservative for analyses regarding Population and Housing, Public Services, and Utilities and Service Systems. However, as the related project is no longer active, it will not be considered an active project for non-quantitative cumulative analysis, such as for Aesthetics or Cultural Resources.

SOURCE: Fehr & Peers, 2019.



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SOURCE: Fehr & Peers, 2018

Hollywood Center Project

Figure III-1
Related Projects Map

IV. Environmental Impact Analysis

A. Aesthetics

1. Introduction

Senate Bill (SB) 743, codified within the Public Resources Code (PRC) Section 21099 et. seq., states that "Aesthetic (…) impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." (PRC Section 21099(d) (1)). As described in Chapter II, *Project Description*, of this Draft EIR, the Project meets these conditions, and, as such, aesthetic impacts associated with the Project would not be considered significant.[1] In addition, City of Los Angeles Zoning Information File No. 2452 (ZI No. 2452) states that projects meeting SB 743 criteria are exempted from a determination of significant impacts on aesthetic resources (scenic vistas, scenic resources, aesthetic character, and light and glare) as outlined in the California Environmental Quality Act (CEQA) Guidelines Appendix G. However, ZI No. 2452 requires that projects in transit priority areas (TPA) be evaluated for consistency with relevant City land use plans and regulations governing scenic quality.

Evaluation of the Project's physical impacts associated with aesthetics is not required in this EIR and is provided for informational purposes only. Pursuant to PRC Section 21099, aesthetic impacts do not include impacts to historic or cultural resources. Such impacts are evaluated pursuant to CEQA in Section IV.C, *Cultural Resources*, of this Draft EIR.

a) Scenic Vistas

The term "scenic vista" generally refers to visual access to, or the visibility of, a particular sight from a given vantage point or corridor.[2] The City of Los Angeles (City) recognizes the value of preserving sightlines (view access) to designated scenic resources or subjects of visual interest from public vantage points. The subjects of valued or recognized views may be focal (meaning of specific individual resources), or panoramic (meaning broad geographic area). The nature of a view may be unique, such as a view from an elevated vantage or particular angle. Existing views may be focused on a single feature, such as a building or garden, or panoramic encompassing a broad field of view, such as ocean/coastal views distant mountain range, or hilltop ridgelines. Within the City, and specific to the Project, the view field along areas of the Mulholland Drive right-of-way,

1 Senate Bill (SB) 743, PRC Section 21099(d)(1).
2 City of Los Angeles, CEQA Thresholds Guide, 2006, p. A-1.

a City of Los Angeles Scenic Parkway with views of the Project Site, is taken into consideration, as well as other valued or recognized public views.[3]

b) Scenic Resources

Scenic resources refer to natural or manmade features of high aesthetic quality. Such features can include landscaping, heritage trees, or natural trees and landforms, as well as buildings and other structures with aesthetic value. Pursuant to CEQA Guidelines Appendix G, this area of consideration includes specific mention of such natural or manmade features when they are located within the view field of a State scenic highway. As previously indicated, Mulholland Drive is a Scenic Parkway; therefore, views of scenic resources from its right-of-way are given special consideration. The Scenic Parkway includes several "Major Vista Points," defined in the City's Mulholland Scenic Parkway Specific Plan as areas within the Mulholland Drive right-of-way with exceptional mountain, ocean, and/or city views that are set aside for public use.

c) Scenic Quality

Scenic quality refers to the overall aesthetic character of an area. Aesthetic features often consist of unique or prominent natural or man-made attributes or several small features that, when viewed together, create a whole that is visually interesting or appealing. Scenic quality may be affected by contrasting features that substantially degrade the visual quality of the Project Site or community. The City has plans, policies and regulations that are relevant to the assessment of scenic quality, such as requirements for street trees, building setbacks, building heights, exterior lighting and signage.

d) Light and Glare

Artificial light is associated with the evening and nighttime hours, and sources may include streetlights, illuminated signage, vehicle headlights, and other point sources. Uses, such as residences and hotels, are considered light-sensitive since they are typically occupied by persons who have an expectation of darkness and privacy during evening hours and who can be disturbed by bright light sources

Glare is primarily a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass or reflective materials, and, to a lesser degree, from broad expanses of light-colored surfaces. Glare can also be produced during evening and nighttime hours by artificial light directed toward a light-sensitive land use. Activities, such as driving, and land uses, such as parks and

[3] As indicated in the City of Los Angeles, CEQA Thresholds Guide, 2006, p. A.1-2, aesthetic character is purposefully nurtured and preserved along City-designated scenic corridors. Therefore, effects on scenic resources within the viewsheds of City Scenic Parkways are typically addressed by the City in aesthetic analyses.

residences, are considered glare sensitive as the presence of glare could interfere with vision and/or result in an irritant to these activities/uses.

2. Environmental Setting

a) Regulatory Framework

(1) State

(a) Senate Bill No. 743

On September 27, 2013, Governor Brown signed SB 743, which became effective on January 1, 2014. The purpose of SB 743 is to streamline the review under CEQA for several categories of development projects including the development of infill projects in TPAs. The bill adds to the CEQA Statute, Chapter 2.7, Modernization of Transportation Analysis for Transit-Oriented Infill Projects, and in particular PRC Section 21099. Pursuant to PRC Section 21099(d)(1): "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment."[4] Pertinent definitions applicable to PRC Section 21099(a) and the Project include:

- "Infill site" means 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.

- "Transit priority area" means an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.

- "Employment center project" means a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75, located within a transit priority area.

- "Major transit stop" is defined by PRC Section 21064.3 to mean a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

The Project Site would meet the criteria set forth in SB 743 because it is: (1) an infill mixed-use development; (2) located within a TPA within one-half mile of the Los Angeles County Metropolitan Transportation Authority (Metro) Red Line Hollywood/Vine Station,

[4] PRC Section 21099(2)(b) clarifies that "For purposes of this subdivision, aesthetic impacts do not include impacts on historical or cultural resources."

a major transit stop; and (3) an employment center project. Because the Project meets the criteria set forth under SB 743, it is exempt from findings of significance related to aesthetic effects, including view, visual quality, and light and glare impacts that may exceed the CEQA Guidelines Appendix G questions used by the City as thresholds of significance. For the purpose of this Draft EIR, aesthetic effects are disclosed for informational purposes only and not for determining whether the Project would result in significant impacts to the environment. The aesthetic impact analysis in this Draft EIR is included to discuss what aesthetic impacts would occur from the Project if PRC Section 21099(d) were not in effect. As such, nothing in the aesthetic impact discussion in this Draft EIR shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

(b) California Art Preservation Act

The California Art Preservation Act (CAPA) of 1979 is intended to protect the works of California visual artists. Visual art is defined as an original painting, sculpture, drawing, or an original work of art "of recognized quality" and applies only to singular original works. Under California Civil Code Section 987.e, the opinions of artists, art dealers, art museum curators, or other persons involved with the creation or marketing of fine art shall determine whether a work of fine art is of recognized quality. Under Section 987.c, no person, except an artist who owns and possesses a work of fine art that the artist has created, shall cause the physical defacement, mutilation, alteration, or destruction of a work of fine art. In situations where a sculpture, mural, or fountain has been integrated into a building that a building owner would alter or tear down, the owner must contact the artist in writing and allow the artist ninety days to remove the artwork. CAPA provides that, if a mural or other artwork cannot be removed without damage, the owner can proceed to destroy it, if a 90-day written notice is provided and appropriately recorded. CAPA also provides that if the artist and the owner enter into a written contract signed by both parties and recorded in the appropriate county recorder's office, then the owner must make a good-faith attempt to notify the artist or the artist's heirs prior to removal.[5]

(c) California Streets and Highways Code

Article 2.5, State Scenic Highways, Section 280 created the system of California Historic Parkways. In order to be designated as a Historic Parkway, a freeway must have: (1) original construction completed prior to 1945; (2) features of historical significance as recognized by the State Office of Historic Preservation, including notable landmarks, historical sites, or natural or human achievements that exist or have occurred during the original construction of the parkway or in the immediately adjacent land area through which the parkway currently passes; (3) any portion of the highway or corridor bound on one or both sides by federal, State, or local parkland, Native American lands or monuments, or other open space, greenbelt areas, natural habitat or wildlife preserves,

5 Aesthetic Legal, The California Art Preservation Act (CAPA), August 22, 2016.

or similar acreage used for or dedicated to historical or recreational uses; and (4) any portion of the highway traversed, at the time of designation and by Caltrans's best count or estimate using existing information, by not less than 40,000 vehicles per day on an annual daily average basis.

(2) City of Los Angeles

(a) General Plan Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element), adopted in December 1996 and readopted in August 2001, establishes the conceptual basis for the City's General Plan.[6] The Framework Element provides direction regarding the City's vision for growth and includes an Urban Form and Neighborhood Design chapter to guide the design of future development.[7] Although the Framework Element does not directly address the design of individual neighborhoods or communities, it embodies broad neighborhood design policies and implementation programs to guide local planning efforts. The Framework Element also clearly states that the livability of all neighborhoods would be improved by upgrading the quality of development and improving the quality of the public realm (Objective 5.5).[8]

Chapter 5 of the Framework Element, Urban Form and Neighborhood Design, establishes a goal of creating a livable city for existing and future residents with interconnected, diverse neighborhoods.[9] "Urban form" refers to the general pattern of building heights and development intensity and the structural elements that define the City physically, such as natural features, transportation corridors, activity centers, and focal elements. "Neighborhood design" refers to the physical character of neighborhoods and communities within the City.[10] The land use forms and spatial relationships identified in the Framework Element are discussed in Section IV.H, *Land Use and Planning*, of this Draft EIR. To the extent the policies included therein relate to the appearance of development, Project consistency with these policies is analyzed later in this section. The Project's consistency with the Framework Element is provided in Section IV.H, *Land Use and Planning*, of this Draft EIR.

6 City of Los Angeles Department of City Planning, General Plan Framework Element, originally adopted December 11, 1996 and readopted August 8, 2001.

7 City of Los Angeles Department of City Planning, General Plan Framework Element, Chapter 5, originally adopted December 11, 1996 and readopted August 8, 2001.

8 City of Los Angeles Department of City Planning, General Plan Framework, Chapter 5, Goal 5A, Objective 5-5, originally adopted December 11, 1996 and readopted August 8, 2001.

9 City of Los Angeles Department of City Planning, General Plan Framework, Chapter 5, Goal 5A, originally adopted December 11, 1996 and readopted August 8, 2001.

10 City of Los Angeles Department of City Planning, General Plan Framework, Executive Summary, originally adopted December 11, 1996 and readopted August 8, 2001.

(b) Hollywood Community Plan

The Project Site is located within the Hollywood Community Plan (Community Plan) area.[11] The Community Plan, adopted in 1988, is one of the 35 Community Plans established throughout the City, which collectively comprise the Land Use Element of the City's General Plan. The 1988 Hollywood Community Plan is the effective planning document for which consistency analysis is conducted for the Project.

Community plans are intended to implement the policies of the Framework Element. Community plans include, among other provisions, guidelines regarding the appearance of development and the arrangement of land uses. The 1988 Hollywood Community Plan does not provide direct policies regarding aesthetic character but does provide cross references to the Hollywood Redevelopment Plan, whose urban design provisions should be implemented in support of the Community Plan's goals. However, Objective 7 of the Hollywood Community Plan encourages the preservation of open space and promotes the preservation of views, natural character and topography of mountainous parts of the Hollywood Community Plan area. Objective 7 is addressed below.

(c) Hollywood Redevelopment Plan

State law ABx1-26 dissolved all California redevelopment agencies, effective October 2011. The legislation prevents redevelopment agencies from engaging in new activities. However, ABx1-26 does not abolish the existing Redevelopment Plan. The land use regulations in the Redevelopment Plan remain in effect and continue to be administered by the CRA/LA.[12] The Community Plan, which is applicable to development within the Hollywood Community area, cross references aesthetic policies in the Hollywood Redevelopment Plan (Redevelopment Plan).[13] The provisions of the Redevelopment Plan, which applies to the Project Site, support the Community Plan's goals. The goals of the Redevelopment Plan as amended October 31, 2003, pertain to reviving an area encompassing approximately 1,107 acres bounded approximately by Franklin Avenue on the north, Serrano Avenue on the east, Santa Monica Boulevard and Fountain Avenue on the south, and La Brea Avenue on the west. The goals established in the Redevelopment Plan promote a positive image for Hollywood through architectural and urban design standards, including standards for height, building setback, continuity of street façade, building materials, and compatibility of new construction with existing structures. Objectives also include promoting landscape criteria and planting programs to ensure additional green space, and coordinating the provision of high quality public improvements. The Project's consistency with the Hollywood Redevelopment Plan is discussed in Section IV.H, *Land Use and Planning*, of this Draft EIR.

11 City of Los Angeles Department of City Planning, Hollywood Community Plan, December 13, 1988.
12 CRA/LA, Memorandum dated June 12, 2102, Attachment A, Resolution No. 16 adopted June 21, 2012.
13 City of Los Angeles, Hollywood Redevelopment Plan, adopted May 7, 1986, amended May 20, 2003.

(d) Los Angeles Municipal Code

The Los Angeles Municipal Code (LAMC) regulates all aspects of building development in the City, including aesthetic aspects, such as lighting and signage. The code sections applicable to aesthetic concerns include the following:

(i) Lighting Regulations

Lighting is regulated by various chapters within the LAMC. The code sections applicable to the Project include the following:

- Chapter 1, Article 2, Section 12.21 A 5(k). All lights used to illuminate a parking area shall be designed, located and arranged so as to reflect the light away from any streets and adjacent premises.

- Chapter I, Article 4.4, Section 14.4.4 E. No sign shall be arranged and illuminated in a manner that will produce a light intensity of greater than three-foot candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.

- Chapter I, Article 7, Section 17.08 C. Plans for street lighting shall be submitted to and approved by the Bureau of Street Lighting for subdivision maps.

- Chapter IX, Article 3, Division 1, Section 93.0117(b). No person shall construct, establish, create, or maintain any stationary exterior light source that may cause the following locations to be either illuminated by more than two-foot candles (21.5 lx) of lighting intensity or receive direct glare from the light source. Direct glare, as used in this subsection is a glare resulting from high luminances or insufficiently shielded light sources that are in the field of view.

    1. Any exterior glazed window or sliding glass door on any other property containing a residential unit or units.
    2. Any elevated habitable porch, deck or balcony on any other property containing a residential unit or units.
    3. Any ground surface intended for use but not limited to recreation, barbecue, or lawn areas on any other property containing a residential unit or units.[14]

[14] Certain exceptions apply related to frosted light sources emitting 800 lumens or less, other sources emitting 800 lumens or more not visible to persons on other residential properties, tennis or paddle tennis courts conforming to certain standards, certain temporary decorative lights, emergency lights, agency controlled light sources, and light sources a minimum distance of 2,000 feet from residential uses.

(ii) Sign Regulations - Hollywood Signage Supplemental Use District

The Hollywood Signage Supplemental Use District (HSSUD) was originally established by Ordinance No. 176,172 in October 2004 and amended under Ordinance No. 181,340 effective beginning November 2010.[15] It was adopted to acknowledge and promote the continuing contribution of signage to the distinctive aesthetic of Hollywood Boulevard, as well as to control the blight created by poorly placed, badly designed signs throughout Hollywood and to protect street views and scenic vistas of the Hollywood Sign and the Hollywood Hills. The HSSUD applies to commercial zones within the Hollywood Community and is applicable to the Project Site.

Ordinance No. 181,340 states the purpose of the ordinance, defines the types of signs that may occur within the HSSUD, and regulates the design of the signs by type. Compliance requires that signs serve only on-site uses, and signs are coordinated with the Project's architectural design, are appropriately scaled to the buildings on the lot, and result in a visually uncluttered appearance. The regulation also addresses such design characteristics as dimensions, area, illumination, location and other appearance considerations. Permits for signs within the HSSUD are only provided after review of the sign and sign-off by the Department of City Planning. Sign-off for larger more notable signs require a Project Permit Compliance (demonstrating compliance with the HSSUD) from the Director of City Planning.

(iii) Mural Ordinance

The Mural Ordinance (Ordinance No. 182,706), codified in LAMC Section 14.1 (Original Art Murals was adopted in August 2013 to allow for the creation of new original art murals (OAM) on private property. An OAM is a one-of-a-kind, hand-painted, hand-tiled, or digitally printed image on the exterior wall of a building that does not contain any commercial message. The underlying intent of the Mural Ordinance is to produce new murals that re-engage communities, especially youth; create new opportunities for muralists; and support mural documentation, presentation, and engagement activities that are interactive, educational, or lead to cultural tourism.[16] Under the Mural Ordinance, the creation of an OAM or designation of a vintage original art mural requires registration with and approval by the City's Cultural Affairs Commission. Once registered, a mural is entered into the Department of Cultural Affair's Murals Database. LAMC Section 14.1.3 regulates the minimum period of time a mural shall remain in place, maximum heights relative to building size, and distance of the mural from the face of the wall to which the mural is affixed.

15 City of Los Angeles, Ordinance No. 181,340.

16 City of Los Angeles Department of Cultural Affairs, Murals, http://culturela.org/murals/, accessed July 23, 2018.

According to LAMC Section 14.1.1, OAMs "have purposes distinct from signs and confer different benefits. Such purposes and benefits include: improved aesthetics; avenues for original artistic expression; public access to original works of art; community participation in the creation of original works of art; community-building through the presence of and identification with original works of art; education about the history of communities depicted in original works of art; and a reduction in the incidence of vandalism. Murals are considered to increase community identity and foster a sense of place if they are located in a manner visible to pedestrians, are retained for substantial periods of time, and include a neighborhood process for discussion."[17]

The registration of an OAM requires a two-year covenant to be filed with the County Recorder to ensure that the mural remains for a minimum of two years. At the end of two years, a registered mural may be removed. An OAM may be removed within the first two years of the date of registration under the following circumstances: (i) the property on which the mural is located is sold; (ii) the structure or property is substantially remodeled or altered in a way that precludes continuance of the mural; or (iii) the property undergoes a change of use authorized by the Department of Building and Safety.[18]

(e) Mulholland Scenic Parkway Specific Plan

The Mulholland Scenic Parkway Specific Plan, adopted by City Council in 1998 and updated in 2003, was mandated by the Scenic Highways Plan, a part of the Circulation Element of Los Angeles City's General Plan. The Mulholland Scenic Parkway Specific Plan recognizes the scenic and recreational opportunities along Mulholland Drive and provides that these amenities and resources be protected and enhanced by means of land use and design controls tailored to the physical character of the Scenic Parkway and the Santa Monica Mountains. The primary purpose of the Specific Plan is to assure maximum preservation and enhancement of the highway's scenic features and resources. The Scenic Parkway comprises, in part, 14 Major Vista Points, the first of which consisting of the Hollywood Bowl Major Vista Point, also known as the Hollywood Bowl Overlook located one mile west of the Hollywood Freeway (US-101).

b) Existing Conditions

(1) Scenic Vistas

The Hollywood Community is highly urbanized with existing scenic vistas consisting primarily of panoramic or broad views of the urban skyline and views to and from the nearby Hollywood Hills. The natural topography of the Hollywood Community rises to the north and northwest toward the Hollywood Hills and allows for high visibility across the community, thus, contributing to an aspect of the area's visual character. The elevated sections of the US-101, although not a designated scenic highway, provide for panoramic

17 City of Los Angeles, Municipal Code Section 14.1.1.
18 City of Los Angeles, Municipal Code Section 14.4.3.

views of the Hollywood Community and a sense of the Community's urban character. Valued views also include views of the Hollywood Community's historical buildings and signage.

There are both broad and focal views available towards the Project Site. The nature of focal views compared to broad views is that the Project Site makes up a larger percentage of the view field relative to the distance between the viewer and the Project Site. The nearer the view location, the more the view field is dominated by the Project Site.

Focal views toward the Project Site include views of the historically and culturally significant Capitol Records Building and the Gogerty Building, which comprise the Capitol Records Complex. Focal views of the Project Site are available from sidewalks along Vine Street, Argyle Avenue, and Yucca Street. Focal views of the Capitol Records Building from Hollywood Boulevard are partially blocked by existing buildings, primarily the Pantages Theatre near Argyle Avenue and the Equitable Building (at Hollywood Boulevard and Vine Street). However, from Hollywood Boulevard, the Capitol Records Building is visible from the intersection of Hollywood Boulevard and Vine Street and substantially visible through a 50-foot-wide surface parking lot located between the Pantages Theatre and the Equitable Building.

Broad views or vistas of the Capitol Records Building are available from the hillside neighborhoods to the north and northwest of the Project Site. The Project Site is also visible from Mulholland Drive Scenic Overlook, a component of the City of Los Angeles Scenic Parkway. As a designated Major Vista Point located within the Mulholland Drive right-of-way, the Overlook is provided for public use and acknowledged for its exceptional view of the City.

In addition to views of the Project Site, view resources associated with the Hollywood Community include views from the Hollywood Hills across the Hollywood Community. Because of the height of the Hollywood Hills, vistas also encompass the Los Angeles Basin, including Downtown Los Angeles. View resources within the Hollywood Community also include views of the Hollywood Hills from Hollywood's urban streets and parks. Views of the hills include views of the Hollywood Sign, which is often seen in conjunction with broader vistas of the Hollywood Hills. The Hollywood Sign, located approximately 2.2 miles to the northwest of the Project Site, is a designated City of Los Angeles Cultural Monument. However, because of dense development in the Project area, public views of the Hollywood Sign from the street and pedestrian level are only intermittently available through north-facing street corridors.

Other view resources in the Project Area include views of historic buildings and signage, such as the Knickerbocker Building (former Knickerbocker Hotel, but currently used for senior housing) and its rooftop sign, which are contributors to the historic Hollywood Boulevard Commercial and Entertainment District. The Hollywood Boulevard Commercial and Entertainment District extends approximately twelve blocks along Hollywood Boulevard and includes the Hollywood Walk of Fame, Grauman's Chinese Theater,

Pantages Theatre, and a range of buildings that exhibit varied architectural styles and signage. The Hollywood Boulevard Commercial and Entertainment District adjoins, but does not include, the southern edge of the Project Site. The US-101, which runs through the Hollywood Community, is not a designated State scenic highway or a California Historic Parkway.

(2) Scenic Resources

The Framework Element designates the Project Site and surrounding area as "Regional Center." This designation denotes a high-density area, and a focal point of regional commerce, identity, and activity. The land use forms and spatial relationships identified in the Framework Element are discussed in Section IV.H, *Land Use and Planning*, of this Draft EIR. The Framework Element designates the Project Site and surrounding area as "Regional Center." This designation denotes a high-density area, and a focal point of regional commerce, identity, and activity. The land use forms and spatial relationships identified in the Framework Element are discussed in Section IV.H, *Land Use and Planning*, of this Draft EIR. The Project Site is not located within a State designated scenic highway corridor[19] or characterized by natural rocks, outcroppings, trees, or other natural features that are considered scenic resources. However, the Project Site does include scenic historical resources that are visible from Mulholland Drive, a designated scenic parkway in the City of Los Angeles General Plan 2035 Mobility Plan.[20] The Scenic Parkway Specific Plan designates the Jerome C. Daniel Overlook (also known as the Hollywood Bowl Overlook) a Mulholland Scenic Parkway Major Vista Point.[21] The Jerome C. Daniel/Hollywood Bowl Overlook, which is located approximately 1.3 miles to the northwest of the Project Site, provides broad vistas across the Project Site, the Hollywood Community, and the Los Angeles Basin. Within the nearby Hollywood Hills, the Hollywood Sign, discussed above, is a City of Los Angeles Historical-Cultural Monument and considered to be a scenic resource.

The existing Capitol Records Complex comprises two architecturally notable buildings, including the 13-story Capitol Records Building and the two-story Late Modern style Gogerty Building. The Capitol Records Building is an example of modernist architecture. The circular Capitol Records tower features deep curved awnings (the building's sunscreens), which add depth and definition at each story. The tall spike emerging at the top of the circular tower creates a resemblance to a stack of records on a turntable with spindle pointing skyward. The building's existing rooftop neon sign contributes to the vibrant aesthetic character of the Hollywood community. The Capitol Records Building is widely recognizable because of its unique design and its high visibility in the vistas of

19 California Department of Transportation (Caltrans), Scenic Highways, https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed March 26, 2020.

20 City of Los Angeles Department of City Planning, General Plan 2035 Mobility Plan, Appendix B, Inventory of Designated Scenic Highways, adopted September 7, 2016.

21 City of Los Angeles Department of City Planning, Mulholland Scenic Parkway Specific Plan, adopted May 13, 1992.

Hollywood, as seen from the US-101 and nearby Hollywood Hills, as well as its visibility from Hollywood Boulevard and Vine Street, Hollywood's most iconic entertainment-related streets. The Project Site also affords focal views of the "Hollywood Jazz: 1945-1972" mural on the south wall of the Capitol Records Building. The mural, which depicts legendary jazz performers, was unveiled in 1990 and restored in 2013. The mural is not a registered City of Los Angeles OAM; however, as a publicly visible, high-quality mural, it is considered a scenic resource. The Mural Ordinance, in itself, reinforces the importance the City places on murals as public art.

In addition to the existing Capitol Records and Gogerty Buildings, the Project Site contains a total of 48 trees, 14 of which are considered "significant" trees. Of these trees, 16 are street trees within the City's public rights-of-way along the Project Site's adjacent roadways. "Significant" trees are defined by the City of Los Angeles Planning Department as any tree with a trunk diameter of eight inches or larger. None of the 48 trees are "protected" by the City of Los Angeles Tree Preservation Ordinance No. 177,404, which defines "protected" trees as coast live oak, western Sycamore, Southern California black walnut, or California bay laurel with trunk diameters of four inches or greater.[22]

Adjacent scenic resources include the Hollywood Walk of Fame, an iconic Hollywood destination in which bronze and terrazzo stars have been embedded into the sidewalk along fifteen blocks of Hollywood Boulevard and three blocks of Vine Street, including sidewalks adjacent to the Project Site (between Hollywood Boulevard and Yucca Street).

As further described in Section IV.C, *Cultural Resources*, of this Draft EIR, other historical resources in the area, not within the Project Site, include the Hollywood Boulevard Commercial and Entertainment District and the individually-designated and contributing historic buildings that comprise that District. The Hollywood Boulevard Commercial and Entertainment District includes the Hollywood Walk of Fame, Grauman's Chinese Theater, Pantages Theatre, and a range of buildings exhibiting varied architectural styles dating from the 1920s to the 1930s. Architectural styles include a mix of Classical Revival, Spanish Colonial Revival, and Art Deco. The Project Site adjoins, but is not located within, the Hollywood Boulevard Commercial and Entertainment District.

Adjacent or nearby historic buildings include the Art Deco Pantages Theatre, Pantages Theatre and the 12-story Equitable Building. The architectural plan for the Equitable Building features gargoyle details and a copper roof. The neoclassical-style, 12-story Guaranty Building is located at Hollywood Boulevard and Ivar Avenue in the same city block as the West Site. The 12-story Spanish-Colonial-style, Knickerbocker Building (1714 Ivar Avenue) adjoins the south edge of the West Site along Ivar Avenue, just to the north of The L. Ron Hubbard Life Exhibition Building (or Guaranty Building).

22 Carlberg Associates, Hollywood Center Project – Vine, Ivar, Yucca, and Argyle Streets, Los Angeles, CA 90028 Tree Report, March 28, 2018, Revised April 11, 2019. Provided in Appendix D of the Draft EIR.

Many of the older buildings in the Hollywood Boulevard Commercial and Entertainment District and surrounding area feature rooftop neon signs that have also been individually designated as City of Los Angeles Historic-Cultural Monuments for their contribution to the historic, visual character of Hollywood Boulevard. These include the Trianon rooftop neon sign, the Mayfair Apartments rooftop neon sign, the Hollywood Plaza neon sign and the Equitable Building neon sign. These signs are consistent with the intent of the HSSUD to acknowledge and promote the continuing contribution of signage to the distinctive aesthetic of Hollywood Boulevard. Although the adjacent Knickerbocker Building is not a City of Los Angeles Historic-Cultural Monument, it is a contributor to the Hollywood Boulevard Commercial and Entertainment District, and its rooftop neon sign is identified as a character defining feature.

(3) Aesthetic Character of the Project Site and Surrounding Area

(a) Aesthetic Character of the Project Site

(i) West Site

The West Site is currently used as a surface parking lot and is characterized by pavement, signage to mark parking entrance driveways, and light poles. No landscaping is provided on-site or within the parking lot, and the concentration of parked cars is dependent on activity in the area. With the exception of an older, two-story building at the northern edge of the Project Site along Yucca Street, the West Site is open and developed with a surface parking lot. The on-site building, constructed in 1978 has no doors or windows along its street frontage, although two street trees are located in the sidewalk in front of a blank wall. The building is currently leased to the American Musical and Dramatic Academy (AMDA) and used for storage. A stucco wall, topped by steel fencing and located to the east of the single-story building, abuts an older two-story, retail building, characterized by large display windows and sidewalk-oriented entrances along Yucca Street. However, the stucco wall and adjacent two-story building are not part of the Project Site. On-street, angled parking is provided along Yucca Street. With the exception of the two street trees fronting the on-site building, only one other tree is provided at the eastern edge of this block of Yucca Street. The remainder of the Project Site's Yucca Street frontage to the west of the on-site building is occupied by an eight-foot-high steel fencing for the enclosed parking lot.

The West Site's Ivar Avenue and Vine Street frontages are occupied entirely by the on-site surface parking lot and steel fencing. The Avalon Hollywood and Knickerbocker Buildings are located outside the Project Site at the southern edge of the parking lot. Two driveways to the parking lot are provided along Ivar Avenue, and one driveway is provided along Vine Street. Parking lot entrances along both streets feature multiple painted "entrance" signs" and parking kiosks. The parking area includes several pole flood lights but no landscaping within the parking lot. Two street trees are located along the Ivar Avenue sidewalk adjacent to the Project Site. With the exception of three double-globed,

classic street lights on Ivar Avenue, the remainder of the Ivar Avenue sidewalk, which is lined with on-street parallel parking, provides no other landscaping or streetscape features. The double-globed lights are a model of the original street lights used in the Hollywood Community and reflect the objectives of the City of Los Angeles Bureau of Street Lighting Museum to "define various communities within the City as well as retain the historic fabric of the City."[23]

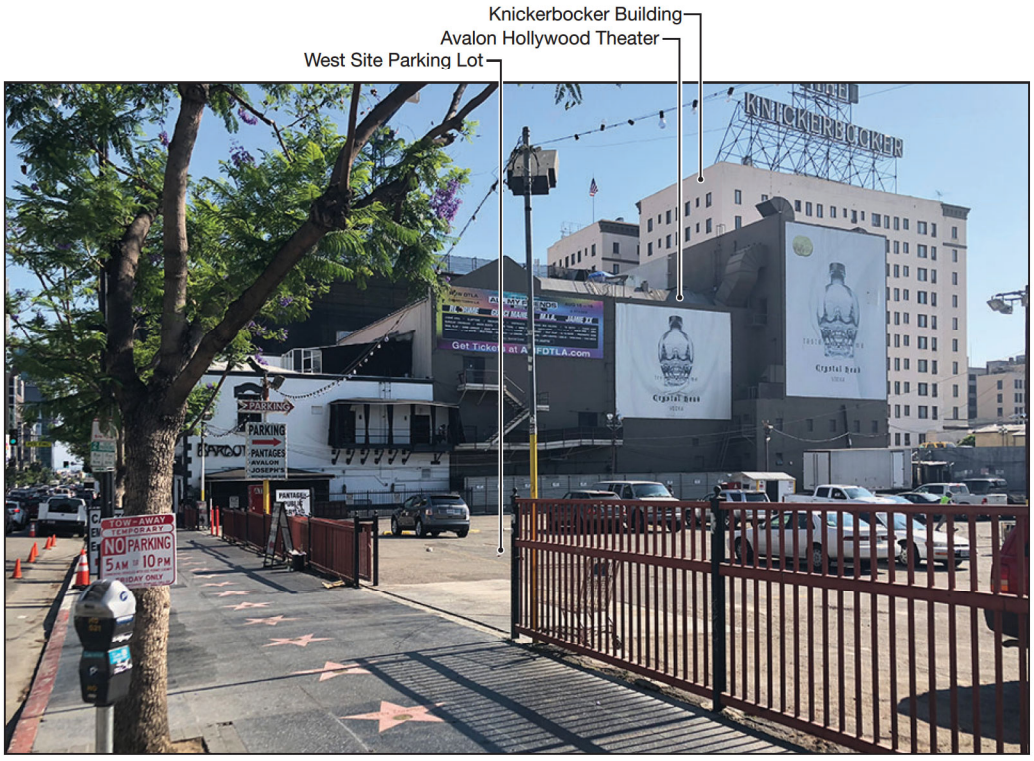
The public sidewalk along Vine Street is part of the Hollywood Walk of Fame and is generally wider and better landscaped than the sidewalks along Ivar Avenue or Yucca Street. In addition to the Hollywood Walk of Fame's brass stars honoring individuals who have contributed to the entertainment industry which are embedded in the sidewalk, the Vine Street public right-of-way has a number of street trees and streetscape amenities. Along Vine Street, the Hollywood Walk of Fame terminates at Yucca Street to the north. The West Site's Vine Street frontage has sections of low movable fencing along the parking lot and four mature jacaranda street trees. Views of the West Site parking lot, as seen from Vine Street and Yucca Street, are shown in **Figure IV.A-1**, *Existing Views of the West Site (Photographs 1 and 2)*. As shown in Figure IV.A-1 and discussed above, the West Site is primarily a paved, surface parking lot with no defining scenic characteristics. With the movement of vehicles into and from the parking lots, free-standing parking signage, the lack of landscape in the parking lot, and the absence of outdoor dining area along the sidewalk adjacent to the West Site, the West Site's existing street frontage is minimally inviting to pedestrians and displays a low level of visual quality, despite the presence of the Hollywood Walk of Fame.

(ii) East Site

The East Site contains the 13-story, 1955 Capitol Records Building and the two-story, 1930s-era Gogerty Building, which are both historical resources, as well as surface parking lots. The Capitol Records Building and Gogerty Building, as viewed from Vine Street to the north of Yucca Street, are shown in **Figure IV.A-2***, Existing Views of the Capitol Records Building and Hollywood Walk of Fame (Photographs 3 and 4)*, Photograph 3. The photographs are intended to supplement the discussion and do not represent the range of detail along the street frontages.

The Gogerty Building occupies the southeast corner of Yucca Street and Vine Street. The building features a curved façade and frosted glass at the Yucca Street/Vine Street corner, consistent with the Late Modern style. The building features broad display windows, other street-oriented windows at the first and second floors, and landscaping within building step-backs along the Yucca Street frontage. A single, ancillary building entrance is also provided along this frontage.

[23] City of Los Angeles Bureau of Street Lighting, Streetlight Museum website, http://bsl.lacity.org/museum.html, accessed October 8, 2019.



PHOTOGRAPH 1: South-facing view of the Vine Street entrance for the West Site parking lot. This street frontage includes the Hollywood Walk of Fame, as noted by the brass and terrazzo stars imbedded in the adjoining sidewalk. The north side of the off-site Avalon Hollywood (Bardot Nightclub), which fronts on Vine Street, is visible in the left background and the north edge of the former Knickerbocker Hotel, which fronts on Ivar Avenue, is visible in the right background.

PHOTOGRAPH 2: South-facing view of the West Site from Yucca Street, just east of Ivar Avenue. This view shows the parking lot and eight-foot steel fencing, as well as the single-story, on-site building. The three-story, off-site commercial building at the center-left of the photo features large display windows and street-front entrances, which are not currently used for pedestrian- oriented uses. In the left edge of the photo, the Capitol Records Building is partially visible across the existing parking lot from most locations along Ivar Avenue. However, from this block of Yucca Street, full views of the building are blocked by intervening buildings.

D170105.00

SOURCE: ESA, 2016

Hollywood Center Project

Figure IV.A-1
Existing Views of the West Site (Photographs 1 and 2)

PHOTOGRAPH 3: South-facing view of Capitol Records Building and Gogerty Building from Vine Street just north of Yucca Street. Because of the low-rise character of the Gogerty Building, this view location provides for a fuller view of the Capitol Records Building's distinctive awnings and spire.

PHOTOGRAPH 4: North-facing view of the Hollywood Walk of Fame from Vine Street looking toward the Capitol Records Building entrance. The building entrance is marked by the metal grid in the upper right of the photo.

D170105.00

SOURCE: ESA, 2018

Hollywood Center Project

Figure IV.A-2
Existing Views of the Capitol Records Building and Hollywood Walk of Fame (Photographs 3 and 4)

A pedestrian walkway and landscaped exit driveway from the Capitol Records Complex is located at the east side of the Gogerty Building. Three pedestrian lights, which are consistent with the building's original period, are located along the north wall along the sidewalk. Pavement treatment in the Yucca Street sidewalk, including scoring of the concrete in the entrance and driveway areas to distinguish the entrance area pavement from the rest of the sidewalk, complements the entrances and vertical features of the building façade. However, no other landscaping or street trees are provided along the Project Site's Yucca Street frontage. Yucca Street also includes on-street parallel parking, which contrasts with the Yucca Street frontage to the west of Vine Street, along which angle on-street parking is provided.

The Gogerty Building's Vine Street façade incorporates the broad use of frosted glass and a solid wall containing an inscribed panel in front of the Gogerty Building. With the exception of the inscribed panel, the panels of the concrete wall, which extends between the Gogerty Building and the Capitol Records Building, are blank. However, the wall features six modern architectural/security lights, which are shielded and focused downward toward a landscaped bed at the base of the wall. The continuous masonry creates a visual and physical continuity between the two buildings.

As with the west side of Vine Street, the adjacent sidewalk is part of the Hollywood Walk of Fame with embedded brass stars honoring entertainment industry individuals. The sidewalk frontage also incorporates mature jacaranda street trees and streetscape, including double-globed, ornate/vintage street lights. The Hollywood Walk of Fame to the north of the Capitol Records Building entrance is shown in Figure IV.A-2, Photograph 4.

To the south of the inscribed panel section near the Gogerty Building, the wall steps back from the sidewalk along the Capitol Records Building frontage to allow for landscaping, including eucalyptus species, groundcover, and various palm tree types. At the step-back, the Hollywood Walk of Fame brass stars are embedded as a double row along the Capitol Records Building's main entrance. The masonry wall and palm tree theme continues from the entrance to the south edge of Capitol Records Building, where it terminates at the existing surface parking lot. As with the section of wall between the Gogerty Building and the Capitol Records Building, the masonry wall provides modern architectural/security lights, which are shielded and focused downward.

The remainder of the East Site, to the south of the Capitol Records Building, is occupied by a surface parking lot. The south wall of the building facing the surface parking lot along Vine Street and visible from the Vine Street sidewalk, contains the "Hollywood Jazz: 1942-1972" mural. The mural originally painted by artist Richard Wyatt in 1990 and funded by the Los Angeles Endowment of the Arts and sponsored by the Los Angeles Jazz Society, depicts jazz legends Chet Baker, Gerry Mulligan, Charlie Parker, Tito Puente, Miles Davis, Ella Fitzgerald, Shelly Mann, Dizzy Gillespie, Billie Holliday, and Nat "King" Cole. After falling into disrepair, Capitol Records and Wyatt restored the mural in 2013. The mural as viewed from Vine Street is shown in **Figure IV.A-3**, *Existing Views of the Hollywood Jazz Mural and Yucca Street Driveway Frontage (Photographs 5 and 6)*, Photograph 5. Figure IV.A-3, Photograph 6, also shows additional detail along the Gogerty Building's Yucca Street frontage and the Yucca Street entrance to the East Site parking lot.

PHOTOGRAPH 5: Northeasterly-facing view of the Capitol Records Building from Vine Street. The Hollywood Jazz Mural, which is located on the south wall of the Capitol Records Building and at the north edge of the East Site parking lot is visible from this location. The off-site 18-story, Argyle House residential mixed-use building is located in the immediate background of the Capitol Records Building.

PHOTOGRAPH 6: South-facing view of the East Site from Yucca Street. This view shows the display windows of the Gogerty Building, located in the photo foreground and the Yucca Street driveway entrance to the Capitol Records Complex. The Argyle House building is visible along the left edge of the photo.

D170105.00

SOURCE: ESA, 2016

Hollywood Center Project

Figure IV.A-3
Existing Views of the Hollywood Jazz Mural and
Yucca Street Driveway Frontage (Photographs 5 and 6)

The East Site's surface parking lot to the south of the Capitol Records Building extends east from Vine Street to Argyle Avenue. Along Argyle Avenue, the East Site's street frontage occupies approximately one third of the block between Yucca Street and Hollywood Boulevard. Along Vine Street, the Hollywood Walk of Fame sidewalk (not part of the Project Site) is adjacent to the western edge of the parking lot, with a single row of brass stars. The parking lot, which has three driveways along the Vine Street frontage, features tall pole flood lights and has no fencing along Vine Street. Three jacaranda street trees mark the north and south edges and the center of the parking lot along Vine Street. Along Argyle Avenue, the parking lot is separated from the sidewalk by a decorative and landscaped masonry wall. The Capitol Records Complex and landscaping at the entrance to the Capitol Records Building and "Hollywood Jazz" mural contribute to the visual character and quality of the East Site. However, much of the street front is characterized by the entrance into the surface parking lot. With the movement of vehicles into and from the parking lot, parking signage, no landscaping within the parking lot adjacent to Vine Street, curb cuts, and the absence of outdoor dining or areas along the sidewalk to attract pedestrians, much of the East Site's street frontage is not inviting to pedestrians and, with the exception of views of the Capitol Records Building and murals, the street front, itself, displays only a moderate level of visual quality.

(b) Aesthetic Character of the Surrounding Area

As discussed above, the Hollywood Community is highly urbanized and includes new mixed-use development and a general mix of retail, hotel, office, entertainment, and residential uses, including a number of historic buildings.

As shown in **Figure IV.A-4**, *Existing Views from the Project Site to the South and East (Photographs 7 and 8)*, and **Figure IV.A-5**, *Existing Views from the Project Site to the North and West (Photographs 9 and 10)*, the area surrounding the Project Site contains both dense urban development and background mountains with substantial open space. Figure IV.A-4, Photographs 7 and 8 illustrate Hollywood's historical urban setting as seen from the Capitol Records Building, as well as broad views of high-rise clusters in Downtown Los Angeles to the east. Rooftop signs characteristic of the Hollywood Boulevard Historic Commercial and Entertainment District are also visible in Figure IV.A-4, Photograph 7. Figure IV.A-5, Photograph 9, shows the Hollywood Hills to the north, including the Hollywood Sign to the west of Mt. Hollywood. The westward continuation of the Santa Monica Mountains/Hollywood Hills is illustrated in Figure IV.A-5, Photograph 10. Photograph 10 also depicts the West Site parking lot as viewed from the Capitol Records Building. As shown in Figure IV.A-5, Photographs 9 and 10, the mountainous open space framing the north edges of the Hollywood community creates an aesthetic backdrop to an otherwise highly urban setting.

PHOTOGRAPH 7: South/southwest view from the Capitol Records Building tower showing the Pantages Theatre in the lower foreground. The low-rise Eastown residential mixed-use development is located directly across Argyle Avenue from the Pantages Theatre. This photo illustrates the mix of new and historic development with downtown Hollywood, as well as rooftop and other types of signage. A panorama of the downtown Los Angeles skyline is also visible from this location.

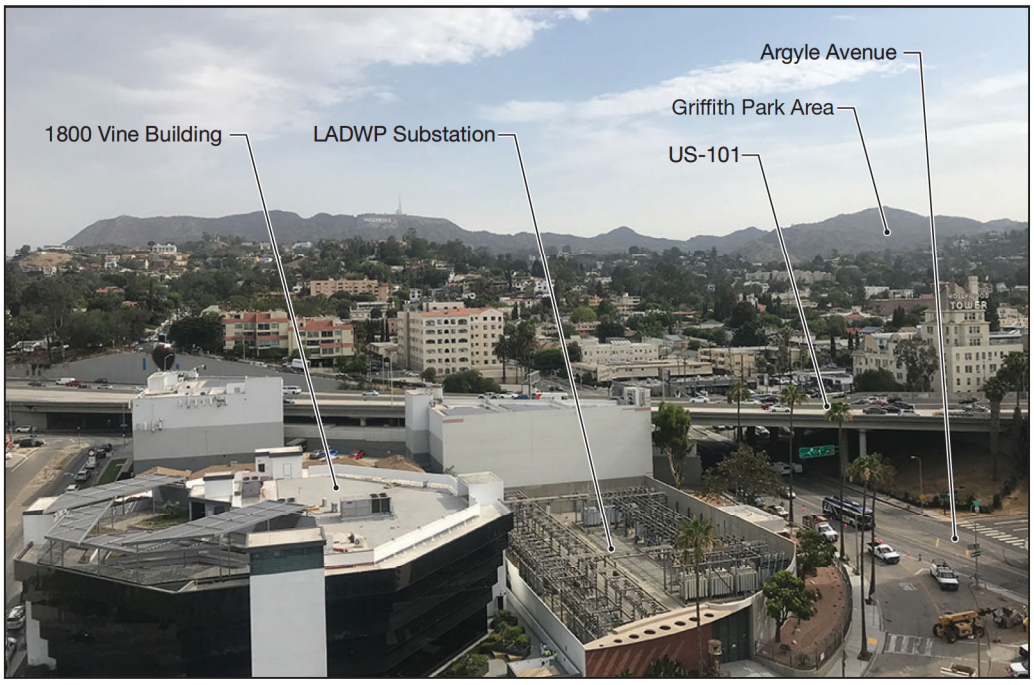
PHOTOGRAPH 8: South-facing view from the Capitol Records Building tower showing the Equitable Building with rooftop signage in the foreground. The photo background features a range of historic and new high-rise buildings with rooftop and wall signage.

D170105.00

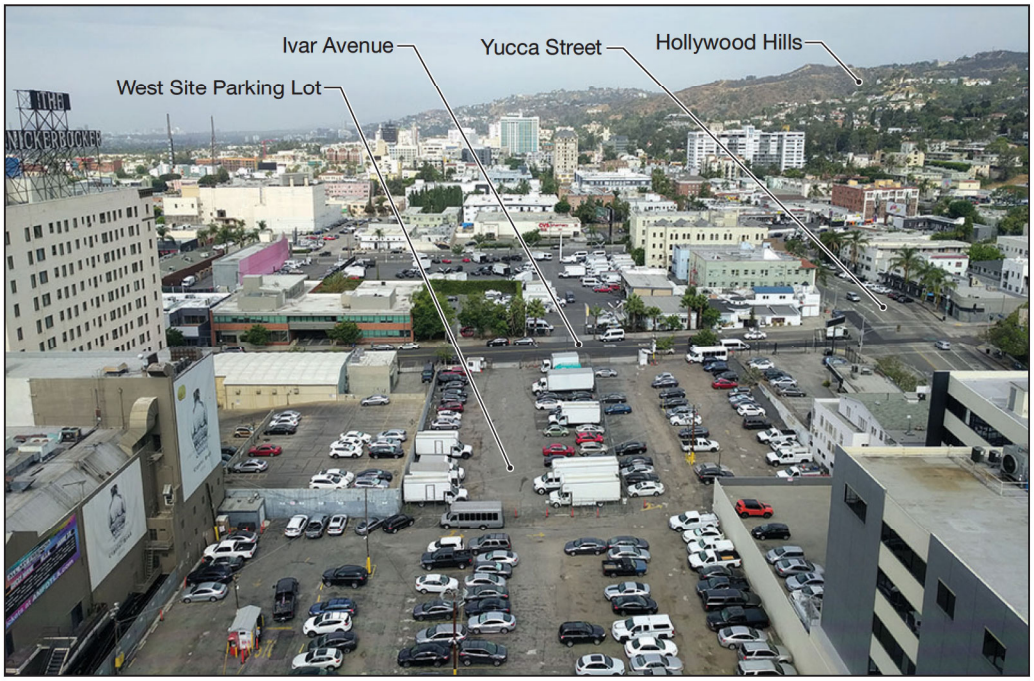
SOURCE: ESA, 2016

Hollywood Center Project

Figure IV.A-4
Existing Views from the Project Site
to the South and East (Photographs 7 and 8)



PHOTOGRAPH 9: North-facing view toward the Hollywood Hills and Mt. Hollywood from the Capitol Records Building. The Hollywood Sign is visible in the upper center-left of the photograph. As seen in this photo, development is largely residential to the north of US-101 (seen running from edge to edge in the middle of the photo) and less dense than within the center of Hollywood's downtown. Much of the mountain view comprises Griffith Park, a regional City park.



PHOTOGRAPH 10: West-facing view from the Capitol Records Building. The westerly extension of the Hollywood Hills/Santa Monica Mountains is visible in the photo background. The photo illustrates the density character of the Hollywood community to the west of the Project Site and the area occupied by the West Site parking lot in the lower foreground.

D170105.00

SOURCE: ESA, 2016

Hollywood Center Project

Figure IV.A-5
Existing Views from the Project Site
to the North and West (Photographs 9 and 10)

Hollywood's historic buildings and signs, although individually considered scenic resources, also contribute to the visual character and quality of the neighborhood surrounding the Project Site. As also shown in Figure IV.A-4, Hollywood's historic buildings mixed with new development establish an eclectic visual character for the area. As shown in Figures IV.A-4 and IV.A-5, both new development and historic buildings are located in the Project vicinity. The recently constructed, 18-story Argyle House, the historic Pantages Theatre (ranging from approximately 44 to 68 feet tall) and the historic 12-story Equitable Building share the same city block as the Project Site. The Argyle House development features deep overhangs at each story and with a similar light building color, complements the adjacent Capitol Records Building.

Other new development in the immediate neighborhood includes the 15-story Kimpton-Everly Hotel. Located at the northeast corner of Argyle Avenue and Yucca Street, this hotel was constructed in 2017-2018. The six-story, Eastown mixed-use development constructed in 2013-2014 is located across Argyle Avenue from the Project Site between Carlos Way and Hollywood Boulevard. Also, the seven-story, mixed-use El Centro Development was constructed in 2017-2018 on the southeast corner of Hollywood Boulevard and Argyle Avenue, southeast of the Project Site.

The new adjacent buildings are modern in design and primarily residential, thus, contrasting with the historical, commercial character of the Hollywood/Vine neighborhood. In addition to introducing new residents to the Hollywood commercial district, the new mixed-use projects, such as the Argyle House and Eastown, provide for more streetscape and trees and generate a more vibrant street front than the surface parking lots and older office building, which were displaced by these developments. For instance, new development, such as El Centro, replaced some of the area's array of surface parking lots. In the older established sections of Hollywood's commercially-zoned ("commercial") district, sidewalk trees, landscaping, and setbacks for public art, plazas, and other gathering spaces are minimal.

The Project area's high pedestrian activity level is due in part to the Metro Red Line Hollywood/Vine Station, located on Hollywood Boulevard between Argyle Avenue and Vine Street. This Metro station is within walking distance of Hollywood's existing highest density development and high-rise buildings within the commercial zone, new mixed-use development in the area, and landmarks, such as the Hollywood Walk of Fame, Pantages Theatre, and the Capitol Records Building. As such, this Metro station fosters pedestrian activity associated with visitors, Hollywood employees, and residents.

Many of the older commercial uses are located within the Hollywood Boulevard Commercial and Entertainment District, and, in keeping with Hollywood's entertainment theme, many buildings in the surrounding area exhibit an array of rooftop, "tall wall," and other vivid wall signs. Some of these signage components are depicted in Figure IV.A-4, Photographs 7 and 8. Street banners along adjacent street corridors further support entertainment venues, provide additional color, and create a vivid reference to Hollywood's entertainment industry. To the south of the Project Site, the historic

Knickerbocker Building exhibits an older rooftop neon sign. The newer, 13-story W Hotel and residences (6250 Hollywood Boulevard) features a broad rooftop sign along Argyle Avenue, consistent with the required signage within the HSSUD.[24]

Existing high-rise buildings in the area, such as the 22-story 6255 Sunset Building Media Building between Vine Street and Argyle Avenue, the 20-story Sunset-Vine Tower between Vine Street and Argyle Avenue on Sunset Boulevard, and the 20-story Columbia Square Project to the south of Selma Avenue on El Centro Avenue, which are located nearby, but not within the Hollywood Boulevard Commercial and Entertainment District, further contribute to the metropolitan aesthetic of the surrounding area.

(4) Light and Glare

The Hollywood Community is characterized by relatively high ambient light levels due to its dense urbanized character. Light sources in the area include street lights, architectural and security lighting on building façades, motor vehicles headlights, and illuminated signage. The level of lighting is higher at intersections as a result of a concentration of street lights, cross traffic, and signage placed on building corners. The HSSUD further encourages the contribution of illuminated signs to the distinctive aesthetic of Hollywood's commercial core. The effects of the HSSUD are visible in illuminated wall signs, supergraphic, and digital signage in the commercial district.

Existing lighting within the Project Site consists of flood lights within the surface parking lots, the illuminated Capitol Records Building sign, and architectural and security lighting for the Capitol Records Complex. Street lights, illuminated signals at adjacent intersections, and vehicle headlights along all of the Project Site frontages (Argyle Avenue, Vine Street, Ivar Avenue, and Yucca Street) also contribute to the Project Site's ambient lighting. The active US-101 and the Hollywood's commercial district and illuminated signage to the south of the Project Site, also contribute to the ambient lighting of the Project area.

Uses that would be sensitive to light and glare in the area include residential uses and hotels, including mixed-use developments such as the Argyle House to the north, and Eastown to the east; the Equitable Building lofts and the Knickerbocker Building to the south; and the Kimpton-Everly Hotel to the northeast of the Project Site. The most notable existing lighting effects within the Project Site consist of the architectural lighting of the Capitol Records Building, including up-lighting of the 90-foot-high spire with seasonal colored lighting to mark certain holidays and events, and its red beacon light, which blinks "H-O-L-L-Y-W-O-O-D" in international Morse Code. During periods when the thirteen floors are not bathed in colored light, or darkened, the spire and the white neon "Capitol Records" sign, which encircles the top floor of the Capitol Records Building, remain

[24] Ordinance No. 181,340 (enacted October 6, 2010) promotes the contribution of signage to the distinctive aesthetic of Hollywood Boulevard and encourages signs that coordinate with the architectural elements of the building on which they are located and reflect a modern, vibrant image of Hollywood as the global center of the entertainment industry.

illuminated. Security lighting for the Capitol Records Complex, street lights, illuminated signals at adjacent intersections, vehicle headlights along all of the Project Site frontages (Argyle Avenue, Vine Street, Ivar Avenue, and Yucca Street), and the nearby US-101 also contribute to the Project Site's existing ambient light levels.

Daytime glare in the area results from sun reflecting from windows, parked vehicles, and other shiny surfaces. Vehicles traversing the US-101 also contribute to daytime (sun-reflected) and nighttime glare. A few highly reflective buildings featuring large panes of glass or other surfaces occur in the area. The sunscreens located at each level of the existing Capitol Records Building shade individual floors and eliminate the potential for reflected sunlight from the glass cladding that encircles the 13-story tower. However, the Project Site's surface parking lots (when full during daytime hours) are a source of reflected light (glare) during certain seasons and times of day, such as the summer tourist season, during daytime or evening programs at the Pantages Theatre, and other events that increase visitor activity in the area.

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a project would have a significant impact related to aesthetics if it would:

Threshold (a): Have a substantial adverse effect on a scenic vista;

Threshold (b): Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway;

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

Threshold (d): Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold Questions. The factors to evaluate aesthetics impacts are listed below.

(1) Scenic Vistas and Visual Resources

- The nature and quality of recognized or valued views (such as natural topography, settings, man-made or natural features of visual interest, and resources such as mountains or the ocean);
- Whether the project affects views from a designated scenic highway, corridor, or parkway;
- The extent of obstruction (e.g., total blockage, partial interruption, or minor diminishment); and
- The extent to which the project affects recognized views available from a length of a public roadway, bike path, or trail, as opposed to a single, fixed vantage point.

(2) For Projects in Urbanized Areas, Conflict with Applicable Zoning and Other Regulations Governing Scenic Quality

- Applicable guidelines and regulations regarding scenic quality.

(3) Light and Glare

- The change in ambient illumination levels as a result of project sources; and
- The extent to which project lighting would spill off the project site and affect adjacent light-sensitive areas.

b) Methodology

As described in the regulatory section above, the Project is a residential, mixed-use, and employment center project on an infill site within a TPA. Therefore, pursuant to PRC Section 21099(d)(1) and ZI No. 2452, aesthetic impacts on the environment, other than those related to historical resources, and consistency with regulations that govern scenic quality, are not considered significant. Furthermore, pursuant to CEQA Guidelines Appendix G, Aesthetics, question (c), evaluation of a project's visual character and quality effects, other than consistency with relevant regulations, is not required in urban areas. Accordingly, the analysis of scenic vistas, scenic resources, visual character and quality, and light and glare is provided herein for informational purposes only. The aesthetic impact analysis in this Draft EIR is included to discuss what aesthetic impacts would occur from the Project if PRC Section 21099(d) were not in effect. As such, nothing in the aesthetic impact discussion in this Draft EIR shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

(1) Scenic Vistas

The analysis of scenic vistas includes a qualitative analysis of whether the Project would block views of valued visual resources and scenic vistas from public vantage points in the Project area. As set forth in the Thresholds Guide, when analyzing aesthetic impacts, views generally refer to visual access to, or the visibility of, a particular sight from a given vantage point or corridor. "Panoramic" views are considered vistas and provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic vistas are usually associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views and vistas might include an urban skyline or mountain range. "Focal views" focus on a particular object, scene, setting or feature of visual interest. Examples of focal views include public art/signs and notable buildings and structures.

Existing views across the Project Site and surrounding area, discussed below, are based on field observations from surrounding public streets, the freeway, and the Hollywood Hills. Although views from representative vantage points are discussed for informational purposes, the degree of impact relative to the threshold applies to views from public vantage points. Under the Thresholds Guide, an office building or private residence would not be considered a viewing location since views of broad horizons, aesthetic structures, and other scenic resources would not be available to the public. In addition, the California courts have routinely held that "obstruction of a few private views in a project's immediate vicinity is not generally regarded as a significant environmental impact."[25]

In order to evaluate the effects of the Project on views, simulations were created to represent the "before and after" effects on the view field created by the Project's high-rise component from fourteen representative view locations. The simulations illustrate the specific changes in representative view fields caused by the individual and combined buildings, and include views from the area surrounding the Project Site, the US-101, and from Hollywood's hillside areas to the north and east of the Project Site. The simulations allow the extent of view blockage created by the buildings to be determined. Nonetheless, as discussed above, scenic vista impacts associated within a TPA are not considered significant under PRC Section 21099(b)(1) and ZI No. 2452.

(2) Scenic Resources

The evaluation of scenic resources is focused on whether identified scenic resources on the Project Site or within the vicinity of the Project would be substantially directly or indirectly damaged by the Project. Scenic resources on the Project Site and in the surrounding area include the Capitol Records Building, the Hollywood Walk of Fame, the Hollywood Sign, and the historic resources within and near the Hollywood Boulevard

25 *Banker's Hill, Hillcrest, Park West Community Preservation Group v. City of San Diego*, 139 Cal.App. 4th 249, 279 (2006).

Commercial and Entertainment District that have value as scenic resources, as well as Mulholland Drive, a designated City of Los Angeles Scenic Parkway. As previously discussed, scenic resources impacts within a TPA are not considered significant under PRC Section 21099(b)(1) and ZI No. 2452. The potential impacts on historic resources, as a result of changes in visual character and views, are further evaluated in Section IV.C, *Cultural Resources*, of this Draft EIR.

(3) Regulations Governing Scenic Quality

The Project is considered for consistency with regulations that govern scenic quality, including Hollywood Community Plan policy, the Planning and Zoning Code, lighting and street tree replacement requirements, and other regulatory documents, such as the HSSUD, as applicable. These include requirements for street trees, building setbacks, building heights, exterior lighting and signage. The CEQA Guidelines allow that projects in urbanized areas need not evaluate visual character and quality, but must show consistency with zoning and regulations that govern scenic quality. Respective regulations include standards set forth in Community Plans, the Planning and Zoning Code, and other regulatory documents.

(4) Light and Glare

The analysis of light and glare describes the existing light and glare environments in the Project area, identifies the light- and glare-sensitive land uses in the area, describes the light and glare sources under the Project, and qualitatively evaluates whether the Project would result in a substantial increase in nighttime lighting and daytime glare as seen from the area's sensitive uses. The analysis of lighting impacts focuses on whether the Project would cause or substantially increase adverse night time lighting effects on light sensitive uses. Included in this analysis is consideration of the affected street frontages, the direction in which Project lighting would be directed, the potential for sunlight to reflect off the exterior surfaces of the proposed buildings, and the extent to which glare would interfere with the operation of motor vehicles or other activities. Light and glare impacts within a TPA are not considered significant under PRC Section 21099(d)(1) and ZI No. 2452.

c) Project Design Features

As further described in Chapter II, *Project Description*, and in Section IV.C, *Cultural Resources*, of this Draft EIR, there are several Project objectives and design features that emphasize the importance of the Capitol Records Complex and its architectural/historical heritage. As it relates to consideration of aesthetics, the Project includes architecturally distinct buildings that pay homage to and are compatible with the Capitol Records Complex. The adjacent buildings are designed to respond to the Capitol Records Building's modernist architectural character and unique form, with prominent curved façades facing the Capitol Records Building and the Hollywood Hills that maximize the

width of view corridors through the Project Site. The East and West Buildings would be designed with strong horizontal features marking individual stories and, as such, would emulate the Capitol Records Building's defined individual stories. These features would contribute to a dimensional character along the surfaces of the Project's East and West Buildings consistent with the surface treatment of the Capitol Records Building. The prominence of the Capitol Records Building and important views to the building are also promoted through building separations, visual buffers and open space between proposed new buildings and the Capitol Records Complex. These building separations and open space areas include a paseo that functions as an amenity for the public at the terminus of the Hollywood Walk of Fame with safe public viewing areas to the Capitol Records Complex, as well as areas for shopping, open-air dining, public performances, art installations, and other community-focused events. The Project design has also taken into account its interface with nearby off-site historical resources, including the Pantages Theatre and Avalon Hollywood, through generous building separations and other treatments.

Further, as discussed in Section IV.C, *Cultural Resources*, of this Draft EIR, prior to any disturbance of the Walk of Fame sidewalks, the locations of the bronze/terrazzo stars will be recorded and the stars temporarily removed and stored, if necessary, according to protocols established by the Hollywood Historic Trust/Hollywood Chamber of Commerce in association with the City Office of Historic Resources and Department of Public Works Bureau of Engineering. At the completion of sidewalk construction or other construction activity affecting the Hollywood Walk of Fame, the stars will be re-installed in identical locations according to established protocols.

In addition to the above characteristics of the Project and required procedure regarding the Hollywood Walk of Fame, the following Project Design Features related to aesthetics will be implemented as part of the Project:

- **AES-PDF-1: Construction Fencing.** Temporary construction fencing will be placed along the periphery of the Project Site to screen construction activity for new buildings from view at the street level. A minimum eight-foot-high construction fence will be located along the perimeter of the active construction sites. Protective fencing or walls will be incorporated between and the south wall of the Capitol Records Building during demolition, excavation, and new building erection on the East Site. The Project Applicant will ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public and that such temporary barriers and walkways are maintained in a visually attractive manner (i.e., free of trash, graffiti, peeling postings and of uniform paint color or graphic treatment) throughout the construction period.

- **AES-PDF-2: Screening of Utilities.** Mechanical, electrical, and roof top equipment (including Heating, Ventilation, and Air Conditioning [HVAC]

systems), as well as building appurtenances, will be integrated into the Project's architectural design (e.g., placed behind parapet walls) and be screened from view from public rights-of-way.

- **AES- PDF-3: Glare.** Glass used in building façades will be anti-reflective or treated with an anti-reflective coating in order to minimize glare (e.g., minimize the use of glass with mirror coatings).

- **AES-PDF-4: Lighting.** Construction and operational lighting will be shielded and directed downward (or on the specific on-site feature to be lit) in such a manner so as to avoid undue glare or light trespass onto adjacent uses.

d) Analysis of Project Impacts

Construction activities would be essentially the same under the Project and Project with the East Site Hotel. Accordingly, Project-related construction impacts under Threshold (a), Threshold (b), and Threshold (d) would be essentially the same under the Project and Project with the East Site Hotel Option. Thus, the conclusions regarding the construction impact analysis presented within those thresholds are the same and apply to the Project and Project with the East Site Hotel Option.

Furthermore, the Project and the Project with the East Site Hotel Option would both completely redevelop the Project Site, although the height of the East Senior Building would be reduced from 11 to nine stories under the Project with the East Site Hotel Option. This difference in building height is noted in several of the simulation figures included in the analysis below (Figures A-9, A-12, and A-20). However, this difference in building height of the East Senior Building does not materially change the analysis of aesthetic impacts under the Project. Accordingly, Project operational impacts discussed under Thresholds (a) to (d) would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the impact analysis, level of significance, and the mitigation measures referenced from Section IV.C, *Cultural Resources*, and Section IV.I, *Noise*, are the same and apply to the Project and the Project with the East Site Hotel Option.

Threshold (a): Would the Project have a substantial adverse effect on a scenic vista?

(1) Impact Analysis

(a) Construction

The Project would demolish the existing parking lots (West and East Sites) and single-story storage building (West Site). However, the Capitol Records Building and the Gogerty Building would continue in operation and would not be demolished or directly impacted by construction activities.

Construction activities may require the temporary removal and re-setting of the terrazzo/brass stars along sections of Vine Street's Hollywood Walk of Fame, as part of new/replacement sidewalk construction. The short-term impacts on views of the Hollywood Walk of Fame would be addressed and reduced to less-than-significant levels with implementation of Mitigation Measure CUL-MM-1, discussed in Section IV.C, *Cultural Resources*, of this Draft EIR. Mitigation Measure CUL-MM-1 states that during construction or reconstruction of the Hollywood Walk of Fame sidewalk, the locations of the bronze/terrazzo stars shall be recorded and the stars temporarily removed and stored, if necessary, according to established protocols. At the completion of sidewalk construction or other construction activity affecting the Hollywood Walk of Fame, the stars shall be re-installed at the same locations according to established protocols.

The proposed construction fencing, rooftop cranes, and other appurtenances of construction would be visible during much of the approximately six-year construction period, which could begin as early as 2021 on the West Site. Construction timing could vary for both sites and could potentially overlap on the West and East Sites (per Chapter II, *Project Description*, of this Draft EIR). The use of earth moving equipment and haul trucks would occur during excavation and site preparation although no overlap of the East Site construction during grading/excavation of the West Site is anticipated. In the overlapping construction scenario, construction could be completed in approximately 4.5 years (beginning 2021 and completed in 2025). Assuming the two sites are built one after another with no overlap, construction of the Project would be completed over an approximately seven-year period (beginning in 2021 and completed in 2027). From the beginning of construction on the East Site, direct views across the existing parking lots, including views of the "Hollywood Jazz: 1945-1972" mural located at south wall of the Capitol Records Building will be enclosed by construction fencing, as proposed by Project Design Feature AES-PDF-1. Although not visible, the mural would not be changed by construction activities, and impacts related to views of the mural would be short-term. In addition, because construction fencing and activities on the East Site would be located to the south of the Capitol Records Building, most prominent views of the Capitol Records Building would remain available from Vine Street and locations to the north, including Yucca Street, the US-101, and the nearby hills to the north and west.

Construction fencing and activities on the West Site would block views of the Capitol Records Building from Ivar Avenue (the existing view is shown in Figure IV.A-1, Photograph 2). Although the top stories of the Capitol Records Building would be visible during the early stages of construction, the development of the West Site, in itself, would create a permanent view blockage. The view blockage of the Capitol Records Building would occur only along the sidewalk adjacent to the Project Site. Ivar Avenue merges into Franklin Avenue one block to the north of the Project Site. At this point, "one-way" signs are posted on the northbound Ivar Avenue so that no vehicles can enter Franklin or Ivar Avenue from the north. Franklin then merges as a one-way, eastbound street at the US-101's southbound Vine Street off-ramp. Because no vehicles can enter Ivar Street from the north where Franklin and Ivar Avenues merge, Ivar Avenue serves only one block of

residential uses and does not function as a through street north of Yucca Street. As a result, Ivar Avenue does not generate high vehicle or substantial pedestrian activity. The numbers of affected viewers would be fewer than those viewing the Capitol Records Building from Vine Street, Argyle Avenue, or other more active roadways and sidewalks. Other closer views of the Capitol Records Building would continue to be available from Vine Street, which is located directly to the east of Ivar Avenue. Because of the limited activity on the affected segment of Ivar Avenue and because motorists and pedestrian viewers would have access to similar focal views of the Capitol Records Building from Vine Street, the blocked view of the Capitol Records Building from segments of Ivar Avenue is not considered a substantial adverse effect on a scenic vista.

Construction activities would also block views of the Capitol Records Building from Hollywood Boulevard (Key View 13) and Argyle Avenue (Key View 14) (see Figures IV.A-19 and IV.A-20, respectively), as described in greater detail below. As discussed below, blocked views of the Capitol Records Building from Key View 13 and Key View 14 would not be considered substantial adverse effects on a scenic vista.

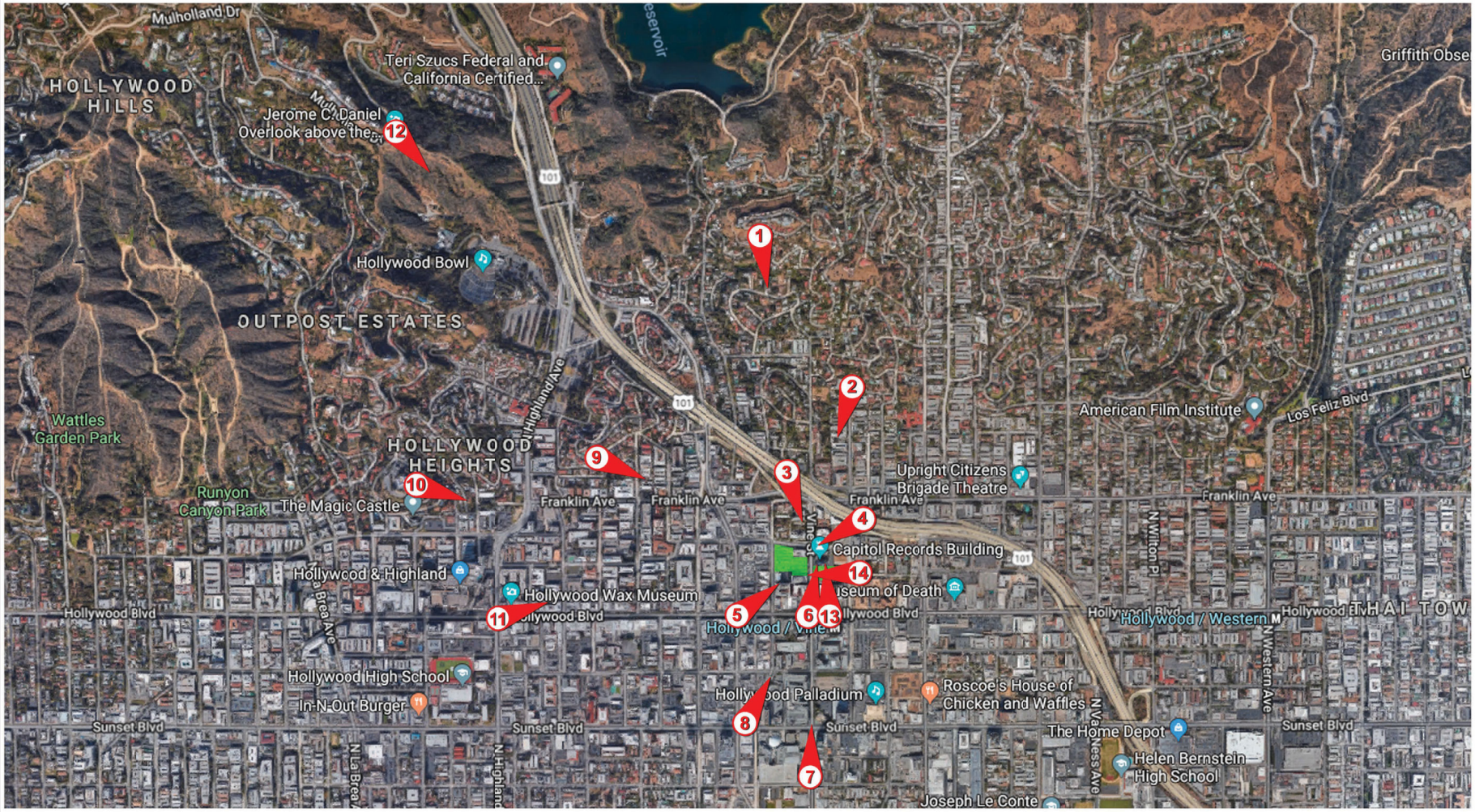
Construction activities would not affect any off-site scenic views although later stages of the high-rise development would partially block passing views of the historic Knickerbocker sign from the US-101. Because of the continuous movement of traffic, however, the freeway view is not considered an important view location for focal views across the urban environment. There are no existing views across the Project Site of the historic Hollywood Sign from adjacent streets or other public areas. As such, high-rise construction would not block views of this scenic resource. The eight-foot-high construction fence required under Project Design Feature AES-PDF-1 will block motorist and pedestrian views of the “Hollywood Jazz: 1945-1972” mural during construction, and sidewalk reconstruction would temporarily disrupt the Hollywood Walk of Fame. However, due to the limited and temporary nature of view impacts relative to the mural and the Hollywood Walk of Fame during construction, the Project would not have a substantial adverse effect on views of these resources. Public views of broader scenic resources, such as the mountains and Hollywood Sign, would continue to be available through street corridors and would not be affected by construction activities. **In addition, during construction of the Project or the Project with the East Hotel Option, the most prominent views of the Capitol Records Complex would remain available from Vine Street and locations to the north, including Yucca Street, US-101, and the nearby hills to the north and west, and, because construction activities are temporary in nature, construction activities would not result in a substantial adverse effect on a scenic vista. Furthermore, pursuant to PRC Section 21099(d)(1) and ZI No. 2452, scenic vista impacts of a residential mixed-use or employment center project located within a TPA would not be considered significant impacts on the environment.**

(b) Operation

To illustrate the effects of the Project with respect to representative public views to the Project Site, view simulations have been prepared. The vantage points used to show existing views and future simulated views with the Project are depicted in **Figure IV.A-6**, *Key View Locations Map*. Note in the simulations that the two-story Gogerty Building, located to the north of the Capitol Records Building, is only visible from immediately adjacent streets and would not be subject to any view effects.

Figure IV.A-7, *Key View 1 - Existing and Simulated Views of the Project Site from Quebec Drive*, below, shows a representative existing panoramic view and simulated future view of the Project as seen from the lower elevations of the Hollywood Hills, approximately 0.7 miles to the north. As illustrated in Figure IV.A-7, the view field encompasses the broader Hollywood community and Hollywood's high-rise buildings, as well as somewhat discernable views of the Downtown Los Angeles skyline in the left portion of the photograph. The existing view reflects an urbanized area beyond the immediate residential area extending into the distance, including Hollywood and portions of the greater Los Angeles basin. The Capitol Records and Gogerty Buildings are not visible from this vantage point. As shown in the simulation of future views, the Project's 46-story East Building and 35-story West Building would be visually prominent within the urbanized visual setting. The 11-story East and West Senior Buildings would not be visible. While the East Building and the West Building would be visually prominent, they would be located within and surrounded by a heavily urbanized area and visual field. The buildings would encompass a small percentage of the view field and would not substantially block panoramic views of the urban setting.

Figure IV.A-8, *Key View 2 - Existing and Simulated Views of the Project Site from Argyle Avenue near Holly Mont Drive,* below, shows the existing view and simulated future view of the Project as seen from Argyle Avenue approximately 0.42 miles to the north. The view location, which is north of the US-101 and higher in elevation than the Project Site, includes panoramic views of dense urban development encompassing some of Hollywood's high-rise buildings. However, because of intervening buildings and vegetation, only the rooftop and 90-foot-high spire of the Capitol Records Building are currently visible. As illustrated in Figure IV.A-8, the Project's proposed 46-story East Building and 35-story West Building would be visually prominent in the view field. The 11-story East and West Senior Buildings would not be visible. As with other views from the north, while the buildings would be visually prominent, they would lie within heavily urbanized areas and would not have a substantial adverse effect on a scenic vista or prominent views of valued visual resources. Because the West Building would be located to the south of the Capitol Records Building, the rooftop spire and top story of the Capitol Records Building would continue to be visible. The field does not include substantial views of other notable or prominent historic buildings or scenic backgrounds that would be blocked by the structures. Therefore, the Project as viewed from this location would not block panoramic views of the urban setting.



SOURCE: VisionScape Imagery, 2018

Hollywood Center Project

Figure IV.A-6
Key View Locations Map

D170105.00

Existing View

Proposed View

D170105.00

SOURCE: VisionScape Imagery, 2018

Hollywood Center Project

Figure IV.A-7
Key View 1 - Existing and Simulated Views of the Project Site from Quebec Drive

Existing View

Proposed View

D170105.00

SOURCE: VisionScape Imagery, 2018

Hollywood Center Project

Figure IV.A-8
Key View 2 - Existing and Simulated Views of the Project Site
from Argyle Avenue near Holly Mont Drive

Figure IV.A-9, *Key View 3 - Existing and Simulated Views of the Project Site from the Eastbound US-101,* below, shows the existing focal view of the Capitol Records Building and panoramic view of the urban setting, as well as the simulated future focal view of the Project as seen from the Hollywood Freeway to the west of Vine Street approximately 0.20 miles to the northwest of the Project Site. As shown in Figure IV.A-9, the most prominent visual features in the existing field of view are the wall billboard on the storage building fronting the freeway and the upper approximately 10 stories and rooftop spire of the Capitol Records Building. The Gogerty Building is not visible in this view. As shown in the Figure IV.A-9 simulation, because of the proximity of the view location to the Project Site, the Project's 46-story East Building and 35-story West Building would be prominent features within this view field. Due to intervening buildings, the Project's 11-story East Senior Building would be minimally visible, with the 11-story West Senior Building being not visible. As with other views from the north, no focal views of the Capitol Records Building or panoramic views of the urban setting would be blocked by the Project.

Figure IV.A-10, *Key View 4 - Existing and Simulated Views of the Project Site from the Westbound US-101,* below, shows the existing focal view of the Capitol Records Building and panoramic views of the urban setting, as well as a simulated future view of the Project, as seen from the US-101 just to the east of Argyle Avenue approximately 0.12 miles from the West Site and 0.15 miles from the East Site. As shown in Figure IV.A-10, the most prominent existing visual features in the field of view are the 15-story Kimpton-Everly Hotel, which is visible in the left edge of the photo, and the 18-story Argyle House building, which is located adjacent to the hotel. Also visible are the upper five stories, rooftop sign and spire of the Capitol Records Building, and, although not prominent, the top of the Knickerbocker Building roof sign located to the right of the Capitol Records Building. No other views of prominent background features are available from this location. The Gogerty Building is not visible in this view. As shown in the Figure IV.A-10 simulation, the Project's 46-story East Building and 35-story West Building would be prominent features in the view field. The buildings would be located on each side of the Capitol Records Building and would frame, rather than block views of, the building from this perspective. The 11-story East and West Senior Buildings would not be visible.

The West Building would block the less prominent view of the Knickerbocker Building rooftop sign when viewed from this segment of the US-101. However, the view blockage would be transitory because of the distance of the sign from westbound freeway lanes, the view across the freeway, and the speed or presence of traffic. Views of the sign from other vantage points further to the west along the freeway would still be accessible, as would existing views of the sign from numerous vantage points within the greater Hollywood area. For instance, the eastbound freeway approach, just west of Vine Street is nearer to the Knickerbocker Building rooftop sign. From this location, the view of the sign is more complete (fuller) and closer than from the location represented in the simulation. Given the limited and transient nature of view blockage associated with the Knickerbocker Building rooftop sign and the view corridor that would highlight views of the Capitol Records Building, the Project as viewed from this location would not substantially block focal views of the Capitol Records Building or other scenic features in the urban setting.

Existing View

Proposed View

D170105.00

SOURCE: VisionScape Imagery, 2018

Hollywood Center Project

Figure IV.A-9
Key View 3 - Existing and Simulated Views of the Project Site from the Eastbound US-101

Existing View

Proposed View

D170105.00

SOURCE: VisionScape Imagery, 2018

Hollywood Center Project

Figure IV.A-10
Key View 4 - Existing and Simulated Views of the Project Site from the Westbound US-101

Figure IV.A-11, *Key View 5 - Existing and Simulated Views of the Project Site from the Intersection of Cahuenga Boulevard and Hollywood Boulevard,* below, shows the existing focal view of the Capitol Records Building and panoramic views of the urban setting, as well as a simulated future view of the Project as seen from the commercial district approximately 0.14 miles to the West Site and 0.15 miles to the East Site. As shown in Figure IV.A-11, the most prominent visual features in the field of view are the adjacent buildings. The six-story, 1920s-era Italian Romanesque-style Security Pacific Building is located at the intersection of Cahuenga Boulevard and Hollywood Boulevard, in the left of the photo. The 12-story neoclassical-style Guaranty Building is located in the center of the photo. The Guaranty Building, constructed in 1923, is located at Hollywood Boulevard and Ivar Avenue in the same city block as the Project's West Site. Views of the Capitol Records Building are blocked by intervening buildings. No other views of prominent background features are available from this location. As shown in Figure IV.A-11 simulation, the Project's 46-story East Building would be prominent in the upper portion of the view field, behind the Guaranty Building. From this proximity, views of the 35-story West Building and the two, 11-story East and West Senior Buildings would be blocked by intervening buildings. Although the Project's 46-story East Building would be prominent in the view field, its orientation on a northeast/southwest axis would reduce the overall mass of the structure relative to the setting. Furthermore, for pedestrians and motorists, foreground and lower street level views would be more prominent. The Project would not block focal views of the Capitol Records Building or panoramic views of the urban setting.

Figure IV.A-12, *Key View 6 - Existing and Simulated Views of the Project Site from the Intersection of Hollywood Boulevard and Vine Street,* below, shows the existing focal view of the Capitol Records Building and simulated future view of the Project as seen from the commercial district approximately 0.06 miles from the West Site and 0.10 miles from the East Site. As shown in Figure IV.A-12, this intersection provides one of the most prominent views of the Capitol Records Building, the primary visual feature in the viewer's line-of-sight. Adjacent foreground buildings include the 12-story, 1930 Equitable Building in the right foreground of the photograph; and a surface parking lot and the south wall of the five-story Hospital Club (formerly Redbury Building, which is now closed and under renovation) in the left foreground of the photo. As shown in the simulation, the West and East Buildings would be located behind (to the north of) the off-site adjacent buildings and in the foreground of the Capitol Records Building. As also shown in the simulation, setbacks of the West and East Buildings from the edge of Vine Street, as well as the distance between the two towers would maintain clear views of the Vine Street corridor looking north to the Capitol Records Building. Because of the setbacks of the Project's 35-story West Building and 46-story East Building from the street edges, as viewed from this location, the Project would not block focal views through the Vine Street corridor of the Capitol Records Building or any minimal views of the Hollywood Hills and Hollywood Sign. However, from this perspective, panoramic views of the Hollywood Hills are not available.

Existing View

Proposed View

D170105.00

SOURCE: VisionScape Imagery, 2018

Hollywood Center Project

Figure IV.A-11
Key View 5 - Existing and Simulated Views of the Project Site
from the Intersection of Cahuenga Boulevard and Hollywood Boulevard

Existing View

Proposed View

D170105.00

SOURCE: VisionScape Imagery, 2020

Hollywood Center Project

Figure IV.A-12
Key View 6 - Existing and Simulated Views of the Project Site from the Intersection of Hollywood Boulevard and Vine Street

Figure IV.A-13, *Key View 7 - Existing and Simulated Views of the Project Site from Vine Street, South of Sunset Boulevard at De Longpre Avenue,* below, shows the existing panoramic view of the Capitol Records Building and urban setting, as well as a simulated future view of the Project as seen from Vine Street at De Longpre Avenue. The view location is approximately 0.54 miles to the south of the Project Site. The 20-story Sunset-Vine Tower, which features a prominent wall sign, is visible in the center right of the photograph. The 22-story 6255 Sunset Media Center Building is visible to the right of the Sunset-Vine Tower. Rooftop signage located on buildings to the north of Selma Avenue (and south of Hollywood Boulevard) are visible in the center of the photograph. No distant views of the Hollywood Sign are available through the Vine Street corridor at this location. Under existing conditions, the Capitol Records Building is minimally visible in the street corridor background. As shown in the simulation, the Sunset-Vine Tower and the Sunset Media Center Building would remain visually prominent. No historic buildings are prominent features in the view field. Further down the street corridor, the 46-story East Building would be visible behind intervening buildings and rooftop signs. The Project's buildings along Vine Street would not block any minimal views of the Hollywood Hills. Because of the distance between the view and the Project Site, the East and West Buildings, because of their slender profiles, would occupy a small percentage of the view field. The Project would not block any panoramic views of the background hills or the Project Site through the street corridor.

Figure IV.A-14, *Key View 8 - Existing and Simulated Views of the Project Site from Just West of the Intersection of Sunset Boulevard and Ivar Avenue,* below, shows the existing panoramic view or the urban setting and simulated future view of the Project as seen from Sunset Boulevard just to the west of Ivar Avenue. The view location is approximately 0.34 miles to the southwest of the West Site and 0.35 miles to the southwest of the East Site. The Capitol Records Building is not visible from this location; however, the rooftop Broadway Hollywood sign is shown in the foreground of the Project Site. As such, the Project would be a background feature with respect to the this and other signage along Hollywood Boulevard and would not reduce the importance of any signs as contributors to the aesthetic character of the Hollywood Boulevard Commercial and Entertainment District. Impacts on the historical values of the Hollywood Boulevard Commercial and Entertainment District are addressed in Section IV.C, *Cultural Resources*, of this Draft EIR. As further shown in Figure IV.A-14, the view is primarily urban with a small section of the Hollywood Hills visible through the Ivar Avenue corridor. The Hollywood Sign, located approximately 2.7 miles to the northeast of this location, would not be visible in the background of the Project Site. It should be noted, that while this is a location where views through north-facing street corridors or across the Project Site afford views of the Hollywood Hills, such views are fragmented, transitory, and do not represent a panoramic scenic vista. As such, this view is not a prominent location for viewing the Hollywood Hills and the Project would not substantially block focal or panoramic views from this location.

Existing View

Proposed View

D170105.00

SOURCE: VisionScape Imagery, 2018

Hollywood Center Project

Figure IV.A-13
Key View 7 - Existing and Simulated Views of the Project Site
from Vine Street, South of Sunset Boulevard at De Longpre Avenue

Existing View

Proposed View

D170105.00

SOURCE: VisionScape Imagery, 2018

Hollywood Center Project

Figure IV.A-14
Key View 8 - Existing and Simulated Views of the Project Site
from Just West of the Intersection of Sunset Boulevard and Ivar Avenue

Figure IV.A-15, *Key View 9 - Existing and Simulated Views of the Project Site from Bonair Place at Whitley Terrace,* below, shows the existing panoramic view and simulated future view of the Project Site as seen from Bonair Place at Whitley Terrace, approximately 0.45 miles northwest of the Project Site. This location provides a partial view of the Capitol Records Building, including the top stories and 90-foot spire. It also provides a partial view of the Elysian Hills on the horizon, which are located to the north of Downtown Los Angeles. From this location the Project's East and West Buildings would be aligned, with the West Building appearing in the foreground of the East Building. As shown in the simulation, the buildings would not block the view of the Capitol Records Building and would comprise a small portion of the view field, which is predominantly urban in nature. For the most part, the partial view of the Elysian Hills would still be visible in the background. In addition, the Project's taller buildings would be situated within an existing urban setting and be consistent with the built environment in the Hollywood commercial center. The Project would not block the existing panoramic view of the Capitol Records Building and would form a small component of the view field.

Figure IV.A-16, *Key View 10 - Existing and Simulated Views of the Project Site from the Hollywood Heights Neighborhood,* below, shows a representative view from the Hollywood Heights neighborhood. The existing view and simulated future view of the Project as seen from the driveway leading to the Yamashiro Restaurant at 1999 N. Sycamore Avenue. The view location is a hillside area accessed via Sycamore Avenue and located approximately 0.8 miles to the west/northwest of the Project Site. Although not a public view location, the simulation illustrates representative public views of the Project Site from the south edge of the Hollywood Hills. The existing setting is a panoramic view of cityscape, with high-rise structures in Downtown Los Angeles visible in the right background, the Elysian Hills visible in the center background, and an extension of the Hollywood Hills visible in the left background. The center of the view field includes urban development within the Hollywood Community, with the Capitol Records Building visible as one building within a dense field of urban development. As shown in the simulation, the West and East Buildings would be slightly juxtaposed, which would broaden the building profile. However, at this distance, the two buildings would form a small part of the broad view field. The West and East Buildings would be substantially taller than existing high-rise buildings in the Hollywood Community and would create a distinctive high-rise component that does not currently exist. The buildings would create a landmark feature and distinguish the Hollywood and Vine locale. However, from this perspective, the Project would partially block the existing view of the Capitol Records Building, as well as the continuity of the existing flat horizon, and contrast with the scale of the existing urban setting. While the Project's buildings would be taller than the existing nearby buildings and alter views from this perspective, pursuant to SB 743, scenic vista impacts would be less than significant.

Existing View

Proposed View

D170105.00

SOURCE: VisionScape Imagery, 2018

Hollywood Center Project

Figure IV.A-15
Key View 9 - Existing and Simulated Views of the Project Site
from Bonair Place at Whitley Terrace

Existing View

Proposed View

D170105.00

SOURCE: VisionScape Imagery, 2018

Hollywood Center Project

Figure IV.A-16
Key View 10 - Existing and Simulated Views of the Project Site from the Hollywood Heights Neighborhood

Figure IV.A-17, *Key View 11 - Existing and Simulated Views of the Project Site from Hollywood Boulevard and Highland Avenue,* below, shows the existing panoramic view of the Project Site and simulated future view of the Project from Hollywood Boulevard at the Highland Avenue intersection. The view location is approximately 0.75 miles to the southwest of the Project Site. The view is primarily urban with no prominent distinctive scenic resources or horizon views. The Capitol Records Building is not visible. The 13-story Hollywood First National Building, constructed in 1928 and a contributor to the historic Hollywood Commercial and Entertainment District, is visually prominent in the foreground to the left. As shown in the simulation, the Project's 35-story West Building would be minimally visible and primarily blocked by intervening buildings. The open street corridor would allow for a broader view of the 46-story East Building, which is visible in the right center background of the simulation. The 11-story East and West Senior Buildings would not be visible. As shown in the simulation, the Project would not block focal views of any distinctive foreground buildings, such as the Hollywood First National Building or any notable background features or panoramic views.

Figure IV.A-18, *Key View 12 - Existing and Simulated Views of the Project Site from the Jerome C. Daniel/Hollywood Bowl Overlook*, below, shows the existing panoramic view of the urban setting and simulated future view of the Project Site as seen from the Jerome C. Daniel/Hollywood Bowl Overlook above the Hollywood Bowl. The view location is approximately 1.25 miles to the northwest of the Project Site. The view field encompasses an expanse of the Los Angeles Basin, with the Downtown high-rise cluster on the horizon, Hollywood's urban center and high-rise buildings in the center of the view field, and the open space of the foreground setting giving way to hillside homes, trees, and the US-101 cutting through the hills. The Capitol Records Building is visible in the center foreground of Hollywood's high-rise buildings as a single building in a dense urban field. The 18-story Argyle House building is located in the left background of the Capitol Records Building. The Capitol Records Building, while distinct because of its unique architecture as with other individual buildings, does not comprise a significant component of the overall urban panorama. As shown in the simulation, the Project's 35-story West Building and 46-story East Building would rise up to the south of the Capitol Records Building. These buildings, while comprising a very small portion of the view field, would be taller and more discernable than the Capitol Records Building and other existing buildings in the Hollywood commercial district. However, they would not substantially diminish this broad scenic view or views of notable visual features, such as the Capitol Records Building, which would remain visible. The 11-story East and West Senior Buildings would be minimally visible. Although visually prominent within the context of the setting, the Project would comprise a very small portion of the broad urban view field, and, because it would not block prominent views of notable visual features, the Project as viewed from this location would not have a substantial adverse effect on a scenic vista.

Existing View

Proposed View

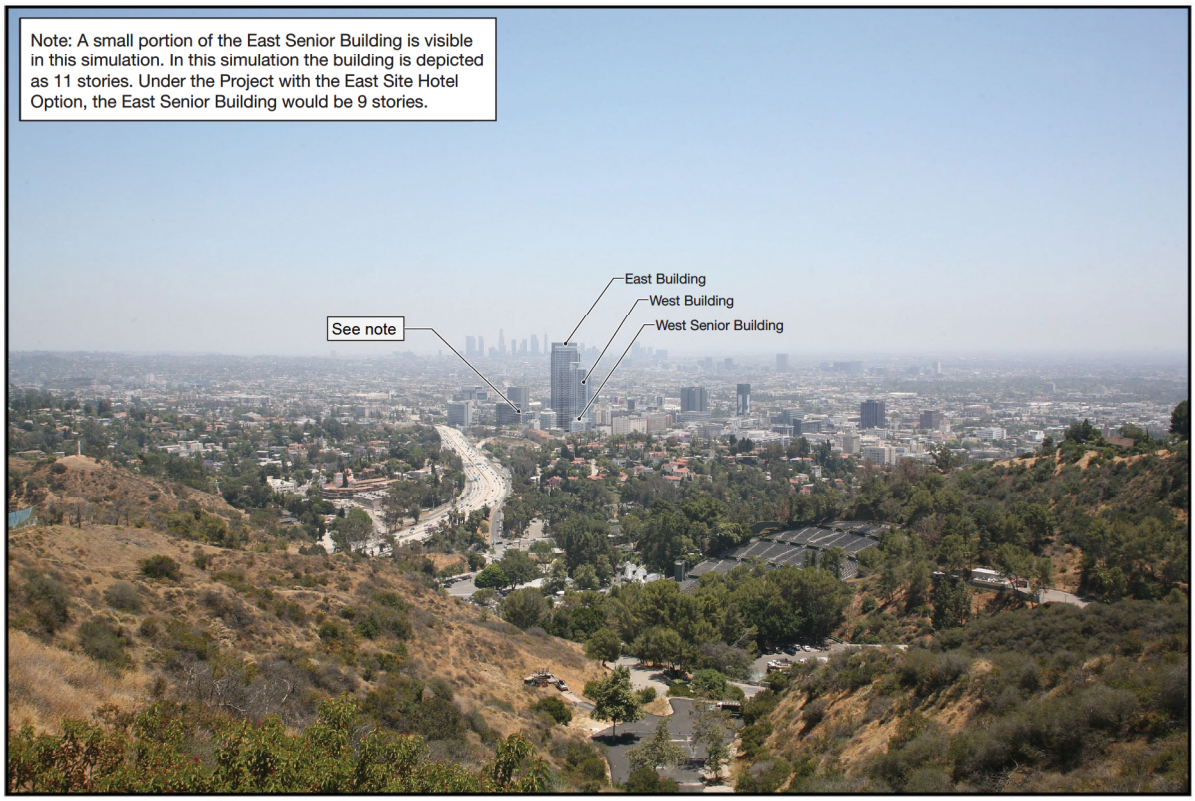
D170105.00

SOURCE: VisionScape Imagery, 2018

Hollywood Center Project

Figure IV.A-17
Key View 11 - Existing and Simulated Views of the Project Site from Hollywood Boulevard and Highland Avenue

Existing View



Proposed View

D170105.00

SOURCE: VisionScape Imagery, 2018

Hollywood Center Project

Figure IV.A-18
Key View 12 - Existing and Simulated Views of the Project Site from the Jerome C. Daniel/Hollywood Bowl Overlook

Figure IV.A-19, *Key View 13 - Existing and Simulated Views of the Project from Hollywood Boulevard*, below, shows the existing focal view and simulated future view of the Project from the south side of Hollywood Boulevard to the west of Metro Red Line Hollywood/Vine Station. The view is toward the north, and the view location is approximately 370 feet to the south of the East Site. Key View 13 is oriented through an approximately 50-foot-wide, gated driveway and parking lot, located between the 12-story Hollywood and Vine Building and the Pantages Theatre. The Hollywood and Vine Building is shown in the left in the photo, and the Pantages Theatre is shown in the right of the photo. The view location is located approximately 75 feet to the west of the entrance plaza for Metro Red Line Hollywood/Vine Station. As shown in Figure IV.A-19, a focal view of the south side of the Capitol Records Building is available through the parking lot/driveway. However, because the Pantages Theatre is located directly across Hollywood Boulevard from the entrance plaza for the Metro Red Line Hollywood/Vine Station, no views of the Capitol Records Building are available from the station entrance area. As shown in the simulation, the East Building would be constructed to the south of the Capitol Records Building and, as such, would block focal views of the Capitol Records Building through the driveway/parking lot from this specific viewing location. While the Project would block focal views of the Capitol Records Building from this perspective, pursuant to SB 743, scenic vista impacts would be less than significant.

Although this view of the Capitol Records Building is available to pedestrians walking from the Metro Red Line Hollywood/Vine Station toward Vine Street, more prominent views of the Capitol Records Building would be available at the intersection of Hollywood and Vine Street, located less than 90 feet to the west of Key View 13. The broader Hollywood/Vine intersection view location (see Figure IV.A-12, Key View 6 - Existing and Simulated Views from the Intersection of Hollywood Boulevard and Vine Street) would be available to all pedestrians currently viewing the Capitol Records Building through the driveway/parking lot since pedestrians passing the driveway/parking lot would be walking to or from this intersection. Because the same pedestrians who would view the Capitol Records Building through the driveway/parking lot would also view the Capitol Records Building from Hollywood Boulevard and Vine Street (less than a quarter-block to the west), the view of the Capitol Records Building from Key View 13 would be considered intermittent.

Figure IV.A-20, *Key View 14 - Existing and Simulated Views of the Project from Argyle Avenue*, below, shows the existing focal view and simulated future view of the Project from the east side of Argyle Avenue, directly across the street from the Project Site. The Capitol Records Building is visible through the existing parking lot, which allows for a view field across the Capitol Records Complex of approximately 200 feet in width. As shown in the simulation, the 11-story East Senior Building would block the view of the Capitol Records Building from this location. Views into and across the Project Site of the Capitol Records Building through the paseo running between Vine Street and Argyle Avenue would become available as the viewer walked or traveled toward the north of the East Senior Building on Argyle Avenue (or approached the paseo entrance from the north on Argyle Avenue). While the Project would block focal views of the Capitol Records Building from this perspective, pursuant to SB 743, scenic vista impacts would be less than significant.

Existing View

Proposed View

D170105.00

SOURCE: VisionScape Imagery, 2018

Hollywood Center Project

Figure IV.A-19
Key View 13 - Existing and Simulated Views of the Project Site from Hollywood Boulevard

Existing View

Proposed View

D170105.00

SOURCE: VisionScape Imagery, 2018

Hollywood Center Project

Figure IV.A-20
Key View 14 - Existing and Simulated Views of the Project Site from Argyle Avenue

(c) Scenic Vistas Impact Summary

As shown in the discussion and simulations of view impacts, construction and operation of the Project would not significantly block views of the Hollywood Sign, the Hollywood Hills, or the Downtown skyline. While the Project would block some focal views of the historic Capitol Records Building from sections of Ivar Avenue, Hollywood Boulevard, and Argyle Avenue, the Capitol Records Building would continue to be visible from more prominent view locations, such as the Hollywood Hills and the intersection of Hollywood and Vine, or other sections along local streets. **Based on the above, the Project or the Project with the East Site Hotel Option would not have a substantial adverse effect on scenic vistas. Furthermore, pursuant to PRC Section 21099(d)(1) and ZI No. 2452, scenic vista impacts of a residential mixed-use or employment center project located within a TPA shall not be considered significant impacts on the environment.**

(2) Mitigation Measures

The Project meets the criteria for a project in a TPA governed by SB 743/PRC Section 21099 and City's ZI No. 2452, and, as such, the aesthetics impacts of the Project shall not be considered significant pursuant to PRC Section 21099(d)(1) and ZI No. 2452. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

As discussed above, this analysis is provided for informational purposes only. The aesthetics impacts of the Project shall not be considered significant pursuant to PRC Section 21099(d)(1) and ZI No. 2452.

Threshold (b): Would the Project substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state-designated scenic highway?

(1) Impact Analysis

(a) Construction

As discussed above, scenic resources within the Project Site include the Capitol Records Building, the Gogerty Building, the on-site "Hollywood Jazz: 1945-1972" mural on the south wall of the Capitol Records Building, and the adjacent Hollywood Walk of Fame. As discussed in Chapter II, *Project Description*, of this Draft EIR, the Capitol Records Building, the Gogerty Building, and the mural would be preserved in place during construction and operation. Implementation of the Mural Ordinance (Ordinance No. 182,706) and the California Art Protection Act would ensure the protection of the mural during construction activities. The Gogerty Building, located to the north of the Capitol

Records Building, would not be affected by the Project. In addition, Mitigation Measure NOI-MM-4 set forth in Section IV.I, *Noise*, of this Draft EIR, would avoid or address potential damage to the Capitol Records Building during construction. If adjoining property owners agree to participate in proposed mitigation, the same mitigation measure would avoid or address potential damage to adjacent, off-site historic buildings, such as the Pantages Theatre and the Knickerbocker Building during construction.

During construction, the bronze and terrazzo stars in the Hollywood Walk of Fame would be potentially impacted by construction vehicles and other construction activity on or adjacent to the Vine Street sidewalk. Implementation of Mitigation Measure MM-CUL-1 (see Section IV.C, *Cultural Resources*, of this Draft EIR) would require that during construction or reconstruction of the Walk of Fame sidewalk, the locations of the bronze/terrazzo stars would be recorded and the stars removed, if necessary, and stored according to protocols established by the Hollywood Historic Trust. At the completion of sidewalk construction or other construction activity affecting the Walk of Fame, the stars would be re-installed in identical locations according to protocols set forth by the Hollywood Historic Trust. With implementation of MM-CUL-1, impacts on the Walk of Fame would be considered less than significant.

The Project Site and adjacent right-of-way also contain 48 trees, 14 of which are considered “significant” trees, and 16 of which are City rights-of-way trees (i.e., street trees). “Significant” trees are defined as any tree with a trunk diameter of eight inches or larger. Existing tree species on the Project Site include Chinese flame, date palm, Mexican fan palm, paperbark, queen palm, and tipu trees. The street trees include jacaranda and pistache trees. None of the trees listed above qualify as “protected” trees under the City’s Tree Preservation Ordinance (Ordinance No. 177,404). Regarding the removal of on-site and street trees, LAMC Section 12.21 G.2, Open Space Requirement for Six or More Residential Units, requires the Project to plant one 24-inch box tree for every four dwelling units. The Project would replace removed street trees with similar species and plant additional trees within the Project Site’s open space areas, including the paseo. Project landscaping would comply with all requirements of the LAMC and the City’s Urban Forestry Division’s requirements, which currently requires street tree replacement on a 2:1 basis and approval by the Board of Public Works.

As shown in the informational analysis above, temporary impacts to scenic resources under the Project or the Project with the East Site Hotel Option would be addressed through compliance to applicable regulatory requirements and implementation of mitigation prescribed for the Hollywood Walk of Fame and nearby vibration sensitive historic buildings. As such, the Project or the Project with the East Site Hotel Option would not substantially damage scenic resources.

Pursuant to PRC Section 21099(d)(1) and ZI No. 2452 scenic resources impacts of a residential mixed-use or employment center project located within a TPA shall not be considered significant impacts on the environment.

(b) Operation

Scenic resources within the Project Site, including the Capitol Records Building, the Gogerty Building, and the "Hollywood Jazz: 1945-1972" mural at the south wall of the Capitol Records Building would remain in their existing locations throughout the operation of the Project. The "Hollywood Jazz: 1945-1972" mural would be incorporated as part of the backdrop for the stage in the East Site's paseo. The paseo would facilitate and invite public use of the Project Site. By creating a public gathering space in proximity to the Capitol Records Building, the Project would increase public viewing opportunities for this historical resource and further support its historic value. The stage and public gathering area would also increase viewer access to the "Hollywood Jazz: 1945-1972" mural. Existing conditions with respect to this scenic resource would be improved since the mural would be partially shielded from sunlight and incorporated into a human gathering space, rather than serving as a back wall for a surface parking lot as under existing conditions. The location of the mural in the background of the stage would enhance the setting for the mural and its aesthetic value.

The Project would upgrade existing sidewalks, remove surface parking lots, install a landscaped median in Vine Street, incorporate a publicly-accessible paseo, and provide street-front retail along Vine Street. The Project would avoid disruption to the Hollywood Walk of Fame by eliminating driveway and vehicular access from Vine Street, including the removal of five existing curb cuts. These changes would help restore continuity to the Hollywood Walk of Fame by reducing vehicle/pedestrian conflicts. The removed curb cuts would further emphasize the Hollywood Walk of Fame as a continuous pedestrian element with the Project's paseo and street-front retail uses.

The Project would not result in any physical changes or damage to the Capitol Records Building, cause permanent changes in the Hollywood Walk of Fame, or result in encroachment upon or elimination of the aesthetic features of adjacent, off-site historic buildings, including the adjacent Pantages Theatre and the Knickerbocker Building. The Project would not generate any physical changes to any of the historic Hollywood Boulevard Commercial and Entertainment District by removing scenic resources or obstructing access to this area. The Project would not encroach into, affect the continuity of, or obstruct public access to this area. Furthermore, the Project's public space and improvements to Vine Street, including the incorporation of a landscaped median along Vine Street and improvements to the Hollywood Walk of Fame, would enhance the aesthetic value of the historic Hollywood Boulevard Commercial and Entertainment District.

Based on the above, Project operation would not damage the Capitol Records Building or other scenic resources in the area. It would also enhance public enjoyment of the historic Capitol Records Building and the Hollywood Jazz mural through improved public access to the Project Site. As such, the Project or the Project with the East Site Hotel Option would not substantially damage scenic resources.

Pursuant to PRC Section 21099(d)(1) and ZI No. 2452, scenic resources impacts of a residential mixed-use or employment center project located within a TPA shall not be considered significant impacts on the environment.

(2) Mitigation Measures

The Project meets the criteria for a project in a TPA governed by SB 743/PRC Section 21099 and City's ZI No. 2452 and, as such, the aesthetics impacts of the Project shall not be considered significant pursuant to PRC Section 21099(d)(1) and ZI No. 2452. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

As discussed above, this analysis is provided for informational purposes only. The aesthetics impacts of the Project shall not be considered significant pursuant to PRC Section 21099(d)(1) and ZI No. 2452.

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

(1) Impact Analysis

The Project is located within an urbanized area and, as such, the concern of this threshold is whether the Project would conflict with regulations that govern scenic quality. These include LAMC street tree replacement, lighting and signage regulations, regulations pertinent to the HSSUD, applicable policies of the Hollywood Community Plan, and regulations that govern building mass. As discussed under Threshold (b), above, the Project would provide for tree replacement in accordance LAMC Section 12.21 G.2, which currently requires street tree replacement on a 2:1 basis. As such, the Project would not conflict with this regulation that governs scenic quality. Per AES-PDF-2, mechanical, electrical, and roof top equipment (including HVAC systems), as well as building appurtenances, would be integrated into the Project's architectural design (e.g., placed behind parapet walls) and be screened from view from public rights-of-way, as required by the LAMC, where applicable.

The Project must comply with lighting regulations that govern the orientation and intensity of outdoor lighting, such as illuminated signage, pursuant to LAMC Section 14.4.4 E, and the intensity of exterior lighting at windows and decks of off-site, adjacent residential units, or residential outdoor spaces used for recreational purposes, pursuant to LAMC Section 93.0117(b). A plan for any new street lighting would be submitted to and must be

approved by the Bureau of Street Lighting to ensure that adjacent properties, such as adjacent, off-site residential uses would not be adversely impacted in accordance with City standards. In addition, all proposed illuminated signs would be reviewed by the City to ensure that lighting would not produce a light intensity of greater than three foot-candles above ambient lighting at the property line of the nearest residentially-zoned property.

The Project must also comply with the HSSUD, which is intended to reflect the contribution of signage to the distinctive aesthetic of the Hollywood Boulevard neighborhood, as well as to control the blight created by former poorly placed, badly designed signs. The Project anticipates minimum signage. However, all signage plans would be submitted for review and must receive sign-off by the Department of City Planning or Director.

The Project is evaluated in relation to the City's lighting regulations and the HSSUD under Threshold (d), below. As discussed therein, the Project would comply with regulations pertinent to exterior lighting and signage and, as such, would not conflict with these regulations.

Further, the Project would also not conflict with Objective 7 of the Hollywood Community Plan, which states: "To encourage the preservation of open space consistent with property rights when privately owned and to promote the preservation of views, natural character and topography of mountainous parts of the Community for the enjoyment of both local residents and persons throughout the Los Angeles region."[26] Objective 7 is the only policy in the Community Plan pertinent to scenic quality. As illustrated in Figure IV.A-18, the Project would be sufficiently distant from public view and open space areas in the vicinity of Mulholland Drive, a City of Los Angeles Scenic Parkway, that it would not block the scenic vista, consisting of the Hollywood Bowl, the Hollywood Community, the Downtown Los Angeles skyline, and the overall Los Angeles Basin from the Mulholland Drive Scenic Parkway. In addition, as illustrated in simulated views from Quebec Drive (Figure IV.A-7), from Argyle Avenue at Holly Mont Drive (Figure IV.A-8), from Bonair Place (Figure IV.A-15), and from the Yamashiro Restaurant driveway (Figure IV.A-16), the Project would form a background feature but would not block the view field from the City's hillside neighborhood streets. As discussed under Threshold (a), above, the Project would be visible from open space, such as the Mulholland Drive Scenic Parkway at the Jerome C. Daniel/Hollywood Bowl overlook and some hillside neighborhoods. However, it would not fill a large percentage of the view field, block distant or horizon views, or change the character of the Community's open space, which is located primarily within the Hollywood Hills. Because the street corridors with views toward the Project Site do not include prominent or significant views of the Hollywood Sign, the Project would not have the potential to substantially block any significant existing views of the Hollywood Sign. Also, with limited available views of the Hollywood Hills through nearby street corridors or across the Project Site, the Project would not block any significant existing views of the Hollywood Hills through street corridors. Finally, the Project would not

[26] City of Los Angeles Department of City Planning, Hollywood Community Plan, December 13, 1988, p. HO-1.

adversely impact views or change the natural character and topography of mountainous parts of the Hollywood Community and would not conflict with the objective of the Community Plan to provide enjoyment of open space by both local residents and persons throughout the Los Angeles region.

Therefore, the Project or the Project with the East Site Hotel Option would not conflict with LAMC lighting regulations, tree replacement regulations, the HSSUD, or the Community Plan's Objective 7 to preserve Hollywood's open space resources. Therefore, impacts with respect to conflicting with regulations that govern scenic quality would be less than significant.

(2) Mitigation Measures

Impacts related to conflicts with applicable zoning and other regulations governing scenic quality were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts related to conflicts with applicable zoning and other regulations governing scenic quality were determined to be less than significant. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (d): Would the Project create a new source of light or glare which would adversely affect day or nighttime views in the area?

(1) Impact Analysis

(a) Construction

Project construction lighting would increase the low level of existing nighttime lighting at the Project Site. However, the Project area is an urbanized setting characterized by a moderate amount of nighttime lighting. Construction activities are anticipated to take place during daylight hours, and construction-related nighttime lighting would be used at the construction site only for safety and security purposes. Construction lighting will be shielded, directed downward, and as required by AES-PDF-4 in such a manner as to avoid undue glare or light trespass onto adjacent uses. In addition, eight-foot tall security fencing will be provided around the construction site as required by AES-PDF-1, which will block ground-level views of the construction site and reduce light spillover onto adjacent properties. Finally, Project construction lighting would be intermittent during certain stages of the construction period. As such, the Project or the Project with the East Site Hotel Option would not project create a new source of light or glare during construction which would adversely affect day or nighttime views in the area.

Pursuant to PRC Section 21099(d)(1) and ZI No. 2452, light and glare impacts of a residential mixed use or employment center project located within a TPA shall not be considered significant impacts on the environment.

(b) Operation

(i) Artificial Light

The Project would introduce new lighting, including wayfinding lights, security lighting, landscape lighting, street-level commercial signs, paseo lighting, architectural accent lighting, and interior lighting visible through windows, all of which would be installed pursuant to LAMC lighting requirements. Architectural accent lighting would be provided at or above the occupied top floors of the two high-rise buildings to emphasize the Project's architectural design and skyline. Architectural lighting provided at the top of the new buildings may be backlit, which would have a similar effect to the Capitol Records Building. Under existing conditions, the Capitol Records Building is periodically or seasonally bathed in colored light. However, even during those periods in which the building is darkened, the building's 90-foot-high spire and the white neon "Capitol Records" sign, which encircles the top floor of the Capitol Records Building, are illuminated in white light. As with existing night-lighting of the Capitol Records Building, the Project's architectural accent lighting would have a varied color pallet to celebrate holidays or days of cultural significance. The Capitol Records Building's existing encircling white neon sign and illuminated spire would be preserved and continued although the use of color would be coordinated among the Capitol Records Building and the Project's two high-rise buildings. The Project would observe no more than 60 days per calendar year to utilize the colored architectural accent lighting. None of the proposed architectural accent lighting would include any moving lights or dynamic lighting effects, such as electronic message display. All proposed lighting would be steady in intensity and color throughout a single night. No still or moving images would be projected onto the buildings.

In combination with the Capitol Records Building, the Project's architectural and rooftop lighting would be consistent with the intent of HSSUD to complement the character-defining features of a historic building. In addition, the use of rooftop illumination would be consistent with HSSUD policy encouraging illuminated signage to reflect a modern, vibrant image of Hollywood as a global center of the entertainment industry.[27] Generally, the Project is anticipated to include rooftop lighting with bulkheads with "uplighting" or backlighting, to provide a soft glow.

Exterior architectural lighting, directed onto the building surfaces, would also be utilized on the Senior Buildings to emphasize their architectural character, to create visual interest, and to enliven the streets and public spaces from which they are visible.

[27] City of Los Angeles Department of City Planning, Ordinance No. 181,340, effective November 17, 2010.

Pedestrian lights within the paseo and along public sidewalks would be provided for security and way-finding. Light emanating from the paseo would be more visible along the Vine Street corridor and more constrained along Argyle Avenue because of the East Senior Building facing the street edge. However, the ground level of the East Senior Building would incorporate retail and restaurant uses, which would have some illuminated signage and light emanating from street-oriented windows and entrances. The paseo would not be directly open to Ivar Avenue or Yucca Street, where less light spillage from the Project would occur. Project lighting would also include light emanating from ground level commercial interior spaces along Ivar Avenue and from residential units in all four buildings. Interior lighting is generally low level and would blend with the existing illuminated character of other mid-rise and high-rise mixed-use residential and hotel uses in proximity to the Project Site.

The Project's exterior light fixtures would share a consistent design throughout the Project Site, and existing modern fixtures on the Capitol Records and Gogerty Buildings' walls and frontages would be retained. Exterior lights would be shielded and directed toward the areas to be lit and away from any adjacent sensitive areas, such as residential uses to the east, west, and north of the Project Site. The Project would comply with LAMC Section 93.0117(b), which limits exterior lighting to no more than two-foot candles of lighting intensity on any property containing residential units.

Commercial signs for ground level restaurant and retail uses would be similar to other signage in the Project vicinity, and no off-site signage is proposed. All proposed signage would conform to the size, type, and placement requirements of the HSSUD, which is applicable to the Project Site.[28] In accordance with the HSSUD, Project signage would be coordinated with the architectural elements of the new buildings and compliment and protect the character defining features of the historic Capitol Records Building. The Capitol Records Building's neon sign would be preserved and continued as under existing conditions. Also, consistent with the HSSUD, the Project's signs would not project from building walls or interfere with the limited street views of the Hollywood Sign (please see the discussion of views of the Hollywood Sign under Threshold (a), above). In addition, all signs must comply with LAMC Section 14.4.4 E, which requires that no sign shall be arranged and illuminated in a manner that will produce a light intensity of greater than three foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.

Existing pole-mounted parking lot flood lights located on both the West and East Sites would be removed, and parking would be located within the interior and subterranean parking levels. As such, the effects of vehicle headlights would be reduced. All lights in public areas would comply with LAMC lighting regulations that include approval of street lighting plans by the Bureau of Street Lighting.

28 City of Los Angeles Department of City Planning, Ordinance No. 181,340, effective November 17, 2010.

Based on the above, with the incorporation of the Project Design Features, and compliance with the applicable LAMC regulations, lighting and illuminated signage associated with the Project or the Project with the East Site Hotel Option would not adversely affect day or nighttime views in the area.

(ii) Glare

Daytime glare is common in urban areas and is typically created when sun reflects off mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials, particularly following sunrise and prior to sunset. Glare generation is typically related to sun angles and is generally greater during the winter or times of the day when the sun is at a relatively low angle. Daytime glare can interfere with the performance of an off-site activity, such as the operation of a motor vehicle. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic or glass curtain walls and trim.

The exterior cladding on the Project's tower component would feature large windows and other potentially reflective materials. To ensure that reflected sunlight would not affect any nearby glare-sensitive uses or activities (e.g., traffic on the US-101 and adjacent residential uses), Project Design Feature AES-PDF-3 requires the use of rated, low-reflectivity building materials. With the implementation of Project Design Feature AES-PDF-3, final glazing choices and trim materials will be evaluated for glare prior to the issuance of a building permit. In addition, the curvature of the high-rise buildings and horizontal expression of the tower façades (e.g., balconies and distinct delineation of all individual stories) would reduce large, flat surfaces and the potential for glare. As such, the Project's architectural features and implementation of Project Design Feature AES-PDF-3 would ensure that potential daytime glare from the building façades would not adversely affect daytime views in the area or interfere with the performance of off-site activities.

Nighttime glare could occur if point source light is directed toward off-site uses, such as the freeway or adjacent residential uses. As discussed above, all exterior lights at street level would be shielded and directed toward the surface being illuminated. As provided in Project Design Feature AES-PDF-4, architectural lighting and building security lighting along public streets and within the paseo will be placed to prevent direct visibility of the light source from the residential uses to the north, east, and west of the Project Site. In addition, the Project is located within Hollywood's commercial district, which is characterized by dense and varied illuminated signage, architectural lighting, lighting associated with the "Capitol Records" sign and illuminated spire, and other light sources, so that Project street level and architectural lighting would not contrast with the locale's ambient levels in a manner that would adversely affect nighttime views in the area.

The Project would also incorporate commercial signage at street level. With compliance with the requirements of the HSSUD (applicable to the Project Site), the Project signs

must minimize potential traffic hazards and protect public safety. As such, this requires that commercial signs not cause excessive glare to adjacent roadways. In addition, LAMC Section 93.0117(b) requires that no exterior light, including illuminated signs, may cause more than two-foot candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors at any property containing residential units; elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any other property containing a residential unit or units. With implementation of existing regulations, as well as Project Design Features AES-PDF-3 and AES-PDF-4, the Project or the Project with the East Site Hotel Option would not result in glare levels that would adversely affect daytime or nighttime views in the area.

Based on the above, with the incorporation of Project Design Features and compliance with the applicable LAMC regulations, the Project or the Project with the East Site Hotel Option would not adversely affect daytime or nighttime views in the area due to increases in light or glare. Furthermore, pursuant to PRC Section 21099(d)(1) and ZI No. 2452, impacts of a residential mixed-use or employment center project located within a TPA shall not be considered significant impacts on the environment.

(2) Mitigation Measures

The Project meets the criteria for a project in a TPA governed by SB 743/PRC Section 21099 and City's ZI No. 2452 and, as such, the light and glare impacts of the Project shall not be considered significant pursuant to PRC Section 21099(d)(1) and ZI No. 2452. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

As discussed above, this analysis is provided for informational purposes only. The light and glare impacts of the Project shall not be considered significant pursuant to PRC Section 21099(d)(1) and ZI No. 2452.

e) Cumulative Impacts

The Project and the Project with the East Site Hotel Option would both completely redevelop the Project Site; however, under the Project with the East Site Hotel Option, the height of the East Senior Building would be reduced from 11 to nine stories. This difference in building height of the East Senior Building does not materially change the analysis of aesthetic impacts under the Project or the Project with the East Site Hotel Option. Accordingly, cumulative impacts would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the cumulative impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

(1) Impact Analysis

Chapter III, *Environmental Setting*, of this Draft EIR, provides the list of the 123 related projects in the City of Los Angeles that the City has identified for the Project, as well as 27 related projects within the City of West Hollywood. Related projects are developments that are planned or are under construction in the Project study area. The related projects are mapped in Chapter III, Figure III-1, *Related Projects Map*. The related projects list primarily reflects infill development within the larger, built out Hollywood Community and City of West Hollywood. As such, they contribute to a variety of local settings with varied aesthetic characteristics. The majority of the related projects are located in different viewsheds from the Project when viewed at the pedestrian level within the flatter, urban areas of Hollywood, which do not allow for panoramic views. From more distant locations at higher elevations, the related projects and Project would contribute cumulatively to changes in the Hollywood skyline. The trend in the Hollywood Community as represented in the complete list of related projects (see Chapter III, Table III-1) is to concentrate development within high density housing developments and taller residential and commercial buildings. However, the Project's East and West Buildings would be taller than other proposed high-rise development in the Hollywood Community.

The potential for the related projects to create cumulative effects in combination with the Project is generally proportional to their distances from the Project Site or proximity to a similar view corridor, such as Vine Street or Hollywood Boulevard. Proximity generally determines the potential of a related project to share the same view field or line-of-sight as the Project. Related Projects with respect to aesthetics are generally located along Vine Street between the US-101 to the north and Fountain Avenue to the south, a distance of approximately 0.71 miles and along Hollywood Boulevard between the US-101 to the east and Highland Avenue to the west, a distance of approximately 1.25 miles. Related projects on Argyle Avenue, Yucca Street, and other nearby streets in the area are also included on the list.

The following related projects for the evaluation of cumulative aesthetic impacts are listed according to their general distance from the Project Site. The building heights or stories cited below are those known at the issuance of the NOP and may change during the respective related projects' development processes. All of the major projects listed below are located within one-half mile of the Metro Red Line Hollywood/Vine Station and, in accordance with PRC Section 21099(d)(1), aesthetic impacts upon the environment shall not be considered significant.

- Related Project No. 1 (Argyle House): 18-story, 108-unit residential mixed-use with 13,400 square feet office uses, 6,200 square feet of work space, and 8,000 square feet of live-work space at 6230 W. Yucca Street

- Related Project No. 2 (citizenM Hotel): 14-story, 216-room hotel with 4,400 square feet of restaurant uses, 108 apartments, 6,200 square feet of work space and 8,000 square feet of live-work space at 1718 N. Vine Street

- Related Project No. 3 (Kimpton-Everly Hotel): 15-story, 225-room hotel at 1800 N. Argyle Avenue Related Project No. 4 (Yucca Street Mixed-Use): 20-story, 191-residential unit mixed use with 260 hotel rooms, and 7,000 square feet of retail space at 6220 W. Yucca Street

- Related Project No. 6 (El Centro): Seven-story, 952-unit residential mixed-use complex with 190,800 square feet of retail space at 6200 W. Hollywood Boulevard

- Related Project No. 7 (Conversion of 1921 Security Bank Building to hotel): Seven-story, 80-room hotel and 15,300 square feet of restaurant space at 6381 W. Hollywood Boulevard

- Related Project No. 8 (Hotel adjacent to the historic Fonda Theatre): 14-story, 27-unit mixed residential complex with 102 hotel rooms and 11,500 square feet of restaurant space at 6140 W. Hollywood Boulevard

- Related Project No. 9 (Live-work and creative space): Eight-story, 121,600-square-foot office building at 1601 N. Vine Street

- Related Project No. 10 (Residential Building adjacent to historic Fonda Theatre): 23-story, 120-unit residential mixed use with 3,300 square feet of restaurant space at 6100 W. Hollywood Boulevard

- Related Project No. 11 (Replacement of 1920's apartment buildings): Seven-story, 68-unit mixed-use apartment complex with 3,700 square feet of restaurant space (at 1723 N. Wilcox Avenue

- Related Project No. 12 (Hollywood Hotel): Seven-story, 140-room hotel with 3,500 square feet of restaurant space at 1717 N. Wilcox Avenue

- Related Project No. 13 (Hollywood and Wilcox Project): 15-story, 220-unit residential mixed use with 8,800 square feet of restaurant space at 6436 W. Hollywood Boulevard

- Related Project No. 14 (Modera Argyle): Seven-story, 276-unit residential mixed use with 9,000 square feet retail space, 15,000 square feet of restaurant space, and 27,000 square feet of grocery store space at 1546 N. Argyle Avenue

- Related Project No. 15 (The Camden): Seven-story, 306-unit residential mixed use with 68,000 square feet of retail space at 1540 N. Vine Street

- Related Project No. 16 (Beauty and Essex Restaurant): Two-story, 10,300 square feet of restaurant space at 1615 N. Cahuenga Avenue

- Related Project No. 17 (Hotel replacing auto repair shop): Six-story, 159-room hotel with 3,500 square feet of restaurant and lounge space at 1921 N. Wilcox Avenue

- Related Project No. 18 (Playhouse Nightclub): One-story, nightclub expansion with 12,300 square feet of bar space and 745,000 square feet of restaurant space at 6506 W. Hollywood Boulevard
- Related Project No. 19 (Commercial Use): Two-story, mixed commercial use with 4,100 square feet of office space and 10,400 square feet of restaurant space at 6523 W. Hollywood Boulevard
- Related Project No. 20 (Selma Hotel): Approximately 12-story, 182-room hotel at 6417 Selma Avenue.
- Related Project No. 25 (Palladium Residential Towers): 28-story (two towers), 731-unit residential mixed use with 7,000 square feet of restaurant floor area, 21,000 square feet of retail floor area at 6201 W. Sunset Boulevard
- Related Project No. 29 (Ivar Gardens Hotel): 21-story, 279-room hotel at 6409 W. Sunset Boulevard
- Related Project No. 30 (Sunset +Wilcox): Approximately 16-story, 190-room hotel with 5,900 square feet of restaurant and banquet uses at 1541 N. Wilcox Avenue
- Related Project No. 32 (Columbia Square Mixed Use): 20-story, 200-unit residential mixed use with 422,500 square feet of office space, 25,500 square feet of restaurant uses, 16,500 square feet of retail uses and 15,000 square feet of health clubs uses at 6121 W. Sunset Boulevard
- Related Project No. 34 (Hotel): Approximately nine-story, 167-room hotel with 10,500 square feet retail space, 9,400 square feet restaurant uses, 1,600 square feet of theater space at 6611 W. Hollywood Boulevard
- Related Project No. 35 (Restaurant in 1934 historic building): Restaurant complex (5-stories) containing 11,400 square feet restaurant uses, 6,100 square feet of special events space, 12,400 square feet of bar floor area at 6608 W. Hollywood Boulevard
- Related Project No. 47 (Academy Square): 23-story, 250-unit residential mixed use with 100 hotel rooms, 282,500 square feet of office space at 1341 N. Vine Street
- Related Project No. 59 (Crossroads Hollywood): Nine building complex of hotel, retail, residential, and office uses, including 30-story, 31-story, and 32-story towers, respectively, at 6701 W. Sunset Boulevard

(a) Scenic Vistas

As viewed from the Hollywood Hills and other areas with higher elevations, such as those areas near the Hollywood Hills to the northeast of the US-101 and to the north of Franklin Avenue, the related projects and the Project would contribute to the Hollywood's existing high-rise profile. The majority of high-rise related projects, which would have greater view impacts than mid-rise development, are located within the designated Hollywood

Regional Center. The "Regional Center" designation, as defined by the Land Use Chapter of the Framework Element, denotes an area of high-density, and a focal point of regional commerce, identity, and activity. This area is sufficiently removed from the Hollywood Hills to not cause obstructions of views from the hillside streets, such as Mulholland Drive's Jerome C. Daniel/Hollywood Bowl Overlook. From the Jerome C. Daniel/Hollywood Bowl Overlook view location, the related projects are not sufficiently close to the view areas to create a substantial obstruction of views of the Los Angeles Basin or horizon.

With regard to focal views, the related projects and the Project are relatively separated or not so close together that they would block focal views of existing buildings or other view resources. However, the nearest related projects, including Related Project No. 1 (the 18-story Argyle House at 6230 W. Yucca Street) and Related Project No. 2 (the 14-story citizenM Hotel at 1718 N. Vine Street) are located within the same city blocks as the Project. The 18-story Argyle House, which is located adjacent to the East Site, currently blocks some transitory views of the Capitol Records Building from the westbound US-101 (as shown in Figure IV.A-10, *Existing and Simulated Views from the Westbound US-101*). The Argyle House also blocks views of the Capitol Records Building from some sections along Argyle Avenue and Yucca Street to the east and west of Argyle Avenue. However, although the view location from the freeway is momentary and positioned across several lanes of eastbound freeway traffic from the Capitol Records Building, the Argyle House also blocks views of the Capitol Records Building from adjacent streets. However, prominent views of the Capitol Records Building would remain available from Vine Street and locations to the north, including Yucca Street, the US-101, and the nearby hills to the north and west. As such, the blockage caused by the Argyle House (Related Project No. 1) is not considered to be cumulatively considerable.

The area's primary views across the of the Capitol Records Building or of the historic Hollywood Sign are through north- and south-facing street corridors, such as Vine Street, Argyle Avenue, and Ivar Avenue. The citizenM Hotel, which would be located on Vine Street adjacent to the Project's West Site, would be constructed in the location of an existing six-story building, across which there are currently no views of the Capitol Records Building or the Hollywood Sign. The proposed 14-story citizenM Hotel would not be constructed nearer the sidewalk in a manner that would block views of either the Capitol Records Building or the Hollywood Hills through the Vine Street corridor. As shown in Figures IV.A-11 (Key View 5 from Cahuenga Boulevard and Hollywood Boulevard) and Figure IV.A-12 (Key View 6, Key View from Hollywood Boulevard and Vine Street), the Project would not block views of the historic Hollywood Sign or the Capitol Records Building, respectively, and, as such, would not contribute to a cumulative view impact.

Related Project No. 65, the Hollywood Central Park Project, would create a public vantage point from the "green bridge" at Hollywood Boulevard, from which panoramic views of the Hollywood Hills, the Hollywood skyline (of which the Project would be a

component), and the Downtown Los Angeles skyline would be available to park visitors. The park, which would extend from Sunset Boulevard to approximately 500 feet to the north of Hollywood Boulevard, would be constructed on an engineered frame in the air space above the US-101. The Park's "green bridge" over Hollywood Boulevard would include a restaurant and other buildings. The deck surface would rise approximately 25 feet above the street grade. West-facing panoramic views of the Hollywood skyline and the Hollywood Hills would be available from the Park. As with views from the surrounding hills, because of the distance of the Project from the view location (0.5 miles), the Project would be a component at the edge of the skyline and would not substantially block views of the skyline from this location. Also, because the distance of the Park from the Project, the Project would not cumulatively contribute to any view blockage caused by "green bridge."

In summary, the Project in combination with the related projects would not block notable focal views or panoramic views of the Hollywood Hills, Hollywood skyline, or Downtown Los Angeles skyline and would constitute an addition to the Hollywood skyline. The Project, in combination with the related projects, would add to the Hollywood downtown skyline as seen from hillside or other more distant locations. While the views of the Project and related projects would be available to hillside residents, long range views of the Hollywood skyline, Downtown Los Angeles skyline, and the Los Angeles Basin from Mulholland Drive would remain available. Although related projects could cause some view blockage from public streets, particularly across existing vacant properties or parking lots, view blockages are considered to be intermittent. **Important views through street corridors and from the Hollywood Hills would continue to be available and, as such, the combination of related projects and the Project or the Project with the East Site Hotel Option would not have a substantial adverse effect on scenic vistas. Furthermore, pursuant to PRC Section 21099(d)(1) and ZI No. 2452, scenic vista impacts of a residential mixed-use or employment center project located within a TPA shall not be considered significant impacts on the environment, and as such the Project's or the Project with the East Site Hotel Option's contribution to cumulative impacts would not be cumulatively considerable. As such, cumulative impacts with respect to scenic vistas would be less than significant.**

(b) Scenic Resources

The Hollywood Community is heavily urbanized, in which most scenic resources include historic buildings or neighborhoods, skyline views, or specific resources, such as the Hollywood Sign and the Capitol Records Building. However, some open space areas, such as the Hollywood Hills, are also visible from the area. [29] As shown in Figure IV.A-13 (view from north-facing Vine Street) and Figure IV.A-12 (view from the Hollywood Bowl), the Project would not significantly block any views of the Hollywood Hills or the Hollywood

[29] City of Los Angeles Department of City Planning, General Plan, Conservation Element, 2001, p. II-50 defines "open space" as any parcel of or area of land that is essentially unimproved and devoted to an open-space use, whether for preservation or human activity.

Sign from public view areas and, as such, would not contribute to cumulative view impacts with respect to this scenic resource. The Project Site is located adjacent to the Hollywood Historic Commercial and Entertainment District, which runs along an approximate 12-block section of Hollywood Boulevard. Many of the related projects are located within the Hollywood Historic Commercial and Entertainment District, including Related Project No. 7, the conversion of 1921 Security Bank Building to a hotel and restaurant. In this cases, the original buildings would be retained. The Security Bank Building would continue to retain its original façade. This related project would remove the features that give the original buildings their historical scenic character and would not affect the scenic character of the Hollywood Historic Commercial and Entertainment District. Other related Projects on Hollywood Boulevard, including Related Project No. 6, El Centro; Related Project No. 8, a hotel adjacent to the historic Fonda Theater, and Related Project No. 10, a residential project also adjacent to the historic Fonda Theater, would be constructed and/or are located on surface parking lots and would not directly affect the scenic character of the Hollywood Historic Commercial and Entertainment District, since these related projects would not remove existing historic buildings, such as the Fonda Theater. Some related projects, such as Related Project No. 11, would replace historic buildings that have contributed to the scenic character of the Hollywood Community. Although not located within the Hollywood Historic Commercial and Entertainment District, Related Project No. 11 would replace an apartment complex constructed in the 1920s. However, Related Project No. 11 is the exception (in the removal of an historic building) in that the majority of related projects evaluated for the purpose of cumulative aesthetic impacts would not be replaced or directly impacted.

The Project, itself, would retain the on-site Capitol Records Building and “Hollywood Jazz” mural, provide for setbacks between the development site and the adjacent Hollywood Historic Commercial and Entertainment District, upgrade the Hollywood Walk of Fame, not remove any historic scenic resources, and enhance access to the Project Site’s historic scenic resources. Furthermore, the Project’s would be making improvements to Vine Street, including the incorporation of a landscaped median and improvements to the Hollywood Walk of Fame.

The Project or the Project with the East Site Hotel Option, in combination with the related projects, would not substantially damage scenic resources. Furthermore, to PRC Section 21099(d)(1) and ZI No. 2452, scenic resources impacts of a residential mixed-use or employment center project located within a TPA shall not be considered significant impacts on the environment, and as such the Project’s or the Project with the East Site Hotel Option’s contribution to cumulative impacts would not be cumulatively considerable. As such, cumulative impacts with respect to scenic resources would be less than significant.

(c) Regulations Governing Scenic Quality

Related projects, as with the Project, are expected to comply with regulations governing scenic quality, including LAMC street tree regulations; exterior lighting regulations; illuminated signage regulations; HSSUP regulations, as applicable; as well as the aesthetic policy (Objective 7) of the Hollywood Community Plan. All street lighting plans must be submitted to, and approved by, the Bureau of Street Lighting to ensure that lighting would not have an adverse impact on sensitive uses. Regarding Objective 7 of the Community Plan, as with the Project, the related projects would be located within Hollywood's central area and would be sufficiently distant from public viewing and open space areas along Mulholland Drive, such as the Jerome C. Daniel/Hollywood Bowl Overlook (see Figure IV.A-18, above), more than one mile to the north. Related projects and the Project would not block existing views or vistas of the urban setting and Los Angeles Basin from the Hollywood Hills, the Hollywood Sign, public overlooks and public parks.[30] The Project would not block views of the Hollywood Sign or broad views of the Hollywood Hills from within the urban area and, thus, would not contribute to any cumulative obstruction of these open space features. The Project and related projects would not adversely change the natural character and topography of mountainous parts of the Community and would not conflict with the objective of the Community Plan to provide enjoyment of open space by both local residents and persons throughout the Los Angeles region. **Therefore, the Project or the Project with the East Site Hotel Option, and related projects would be required to comply with the LAMC and other regulations to ensure that they would not conflict with zoning or other regulations that govern scenic quality. Therefore, the Project's or the Project with the East Site Hotel Option's contribution to cumulative impacts would not be cumulatively considerable. As such, cumulative impacts with respect to regulations governing scenic quality would be less than significant.**

(d) Light and Glare

The largest of the recently proposed related projects in the Project area are located within the designated Hollywood Community Regional Center. The Hollywood Regional Center is an urbanized area with a considerable amount of retail development, a number of entertainment venues and a large amount of signage that create a well-lit and vibrant urban landscape. The cumulative development occurring within the area typically includes lighting that is appropriate to the respective uses including mid- and high-rise residential uses, hotel, restaurants, and office buildings. Pursuant to City policies and regulations for the Regional Center, new illuminated signs would be required to meet standards set forth in the HSSUD. The HSSUD controls the number of signs, types of lighting, and other conditions to benefit the visual character of the Hollywood commercial district. Signage

[30] City of Los Angeles Department of City Planning, Hollywood Community Plan, Objective 7, December 13, 1988, p. HO-1.

would also be required to blend with the architectural character of proposed new development.

In addition, many historic illuminated signs occur within the Regional Center, such as the Capitol Records, the Knickerbocker Building sign, and others. New related projects would not require the removal of such signs and would continue to retain the vibrant and varied nighttime environment created by Hollywood's range of signs.

All new development must comply with existing regulations, such as LAMC Section 93.0117(b), which prohibits any exterior light from causing more than two-foot candles of lighting intensity or direct glare onto any residential property, and LAMC Section 14.4.4 E, which requires that no sign shall be arranged and illuminated in a manner that will produce a light intensity of greater than three foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property, the related projects would not produce glare effects on nearby sensitive uses or activities that would adversely affect nighttime views in the area.

Given the large number of related projects concentrated in the Hollywood Regional Center, which already has relatively high levels of ambient light; required compliance with existing LAMC regulations pertinent to lighting and illuminated signage in the Project area; implementation of the HSSUD regulations pertinent to managing illuminated signs, the Project's or the Project with the East Site Hotel Option's contribution to cumulative impact related to light and glare that would adversely affect nighttime views in the area would not be cumulatively considerable. Furthermore, pursuant to PRC Section 21099(d)(1) and ZI No. 2452, light and glare impacts of a residential mixed-use or employment center project located within a TPA shall not be considered significant impacts on the environment, and as such the Project's or the Project with the East Site Hotel Option's contribution to cumulative impacts would not be cumulatively considerable. As such, cumulative impacts with respect to light and glare would be less than significant.

(2) Mitigation Measures

Cumulative impacts regarding aesthetics were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts regarding aesthetics were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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IV. Environmental Impact Analysis

B. Air Quality

1. Introduction

This section evaluates the Project's potential air quality impacts, as well as its potential cumulative air quality impacts, generated by construction and operation of the Project. This section estimates the air pollutant emissions generated by Project construction and operation and whether Project emissions would conflict with or obstruct implementation of the applicable air quality plan; result in a cumulatively considerable net increase of any criteria pollutant in non-attainment of federal or State ambient air quality standard; expose sensitive receptors to substantial pollutant concentrations; or result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. This section relies on the information, data, assumptions, calculation worksheets, and model outputs in the Air Quality/Greenhouse Gas Emissions Technical Appendix (AQ/GHG Technical Appendix) prepared by ESA included in Appendix E, of this Draft EIR, unless otherwise stated.

2. Environmental Setting

a) Air Quality Background

(1) Criteria Pollutants

Certain air pollutants have been recognized to cause notable health problems and consequential damage to the environment either directly or in reaction with other pollutants due to their presence in elevated concentrations in the atmosphere. Such pollutants have been identified and regulated as part of the overall endeavor to prevent further deterioration and facilitate improvement in air quality. The following pollutants are regulated by the United States Environmental Protection Agency (USEPA) and are subject to emissions control requirements adopted by federal, state and local regulatory agencies. These pollutants are referred to as "criteria air pollutants" as a result of the specific standards, or criteria, which have been adopted for them. A description of the health effects of these criteria air pollutants are provided below.

(a) Ozone (O_3)

Ozone is a secondary pollutant formed by the chemical reaction of volatile organic compounds (VOCs) and nitrogen oxides (NO_X) in the presence of sunlight under favorable meteorological conditions, such as high temperature and stagnation episodes. Ozone concentrations are generally highest during the summer months when direct

sunlight, light wind, and warm temperature conditions are favorable. According to the USEPA, ozone can cause the muscles in the airways to constrict potentially leading to wheezing and shortness of breath.[1] Ozone can make it more difficult to breathe deeply and vigorously; cause shortness of breath and pain when taking a deep breath; cause coughing and sore or scratchy throat; inflame and damage the airways; aggravate lung diseases, such as asthma, emphysema, and chronic bronchitis; increase the frequency of asthma attacks; make the lungs more susceptible to infection; continue to damage the lungs even when the symptoms have disappeared; and cause chronic obstructive pulmonary disease.[2] Long-term exposure to ozone is linked to aggravation of asthma, and is likely to be one of many causes of asthma development and long-term exposures to higher concentrations of ozone may also be linked to permanent lung damage, such as abnormal lung development in children.[3] According to the California Air Resources Board (CARB), inhalation of ozone causes inflammation and irritation of the tissues lining human airways, causing and worsening a variety of symptoms and exposure to ozone can reduce the volume of air that the lungs breathe in and cause shortness of breath.[4] The USEPA states that people most at risk from breathing air containing ozone include people with asthma, children, older adults, and people, who are active outdoors, especially outdoor workers.[5] Children are at greatest risk from exposure to ozone because their lungs are still developing, and they are more likely to be active outdoors when ozone levels are high, which increases their exposure.[6] According to CARB, studies show that children are no more or less likely to suffer harmful effects than adults; however, children and teens may be more susceptible to ozone and other pollutants because they spend nearly twice as much time outdoors and engaged in vigorous activities compared to adults.[7] Children breathe more rapidly than adults and inhale more pollution per pound of their body weight than adults and are less likely than adults to notice their own

1 United States Environmental Protection Agency (USEPA), Health Effects of Ozone Pollution, https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution, accessed February 25, 2020.

2 USEPA, Health Effects of Ozone Pollution, https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution, accessed February 25, 2020.

3 USEPA, Health Effects of Ozone Pollution, https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution, accessed February 25, 2020.

4 California Air Resources Board (CARB), Ozone & Health, Health Effects of Ozone, https://ww2.arb.ca.gov/resources/ozone-and-health, accessed February 25, 2020.

5 USEPA, Health Effects of Ozone Pollution, https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution, accessed February 25, 2020.

6 USEPA, Health Effects of Ozone Pollution, https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution, accessed February 25, 2020.

7 CARB, Ozone & Health, Health Effects of Ozone, https://ww2.arb.ca.gov/resources/ozone-and-health, accessed February 25, 2020.

symptoms and avoid harmful exposures.[8] Further research may be able to better distinguish between health effects in children and adults.[9]

(b) Volatile Organic Compounds

VOCs are organic chemical compounds of carbon and are not "criteria" pollutants themselves; however, they contribute with NO_X to form ozone, and are regulated to prevent the formation of ozone.[10] According to CARB, some VOCs are highly reactive and play a critical role in the formation of ozone, other VOCs have adverse health effects, and, in some cases, VOCs can be both highly reactive and have adverse health effects.[11] VOCs are typically formed from combustion of fuels and/or released through evaporation of organic liquids, internal combustion associated with motor vehicle usage, and consumer products (e.g., architectural coatings, etc.).[12]

(c) Nitrogen Dioxide (NO_2) and Nitrogen Oxides

NO_X is a term that refers to a group of compounds containing nitrogen and oxygen. The primary compounds of air quality concern include nitrogen dioxide (NO_2) and nitric oxide (NO). Ambient air quality standards have been promulgated for NO_2, which is a reddish-brown, reactive gas.[13] The principal form of NO_X produced by combustion is NO, but NO reacts quickly in the atmosphere to form NO_2, creating the mixture of NO and NO_2 referred to as NO_X.[14] Major sources of NO_X include emissions from cars, trucks and buses, power plants, and off-road equipment.[15] The terms NO_X and NO_2 are sometimes used interchangeably. However, the term NO_X is typically used when discussing emissions, usually from combustion-related activities, and the term NO_2 is typically used when discussing ambient air quality standards. Where NO_X emissions are discussed in the context of the thresholds of significance or impact analyses, the discussions are based on the conservative assumption that all NO_X emissions would oxidize in the atmosphere to form NO_2. According to the USEPA, short-term exposures to NO_2 can potentially aggravate respiratory diseases, particularly asthma, leading to respiratory symptoms (such as coughing, wheezing or difficulty breathing), hospital admissions and visits to emergency rooms, while longer exposures to elevated concentrations of NO_2 may

8 CARB, Ozone & Health, Health Effects of Ozone, https://ww2.arb.ca.gov/resources/ozone-and-health, accessed February 25, 2020.

9 CARB, Ozone & Health, Health Effects of Ozone, https://ww2.arb.ca.gov/resources/ozone-and-health, accessed February 25, 2020.

10 USEPA, Technical Overview of Volatile Organic Compounds, https://www.epa.gov/indoor-air-quality-iaq/technical-overview-volatile-organic-compounds, , accessed February 25, 2020.

11 CARB, Air Quality and Land Use Handbook: A Community Health Perspective, page A-4.

12 CARB, Air Quality and Land Use Handbook: A Community Health Perspective, page A-4.

13 CARB, Nitrogen Dioxide & Health, https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health, accessed February 25, 2020.

14 CARB, Nitrogen Dioxide & Health, https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health, accessed February 25, 2020.

15 USEPA, Nitrogen Dioxide (NO_2) Pollution, https://www.epa.gov/no2-pollution/basic-information-about-no2, accessed February 25, 2020.

contribute to the development of asthma and potentially increase susceptibility to respiratory infections.[16] According to CARB, controlled human exposure studies that show that NO_2 exposure can intensify responses to allergens in allergic asthmatics.[17] In addition, a number of epidemiological studies have demonstrated associations between NO_2 exposure and premature death, cardiopulmonary effects, decreased lung function growth in children, respiratory symptoms, emergency room visits for asthma, and intensified allergic responses.[18] Infants and children are particularly at risk from exposure to NO_2 because they have disproportionately higher exposure to NO_2 than adults due to their greater breathing rate for their body weight and their typically greater outdoor exposure duration, while in adults, the greatest risk is to people who have chronic respiratory diseases, such as asthma and chronic obstructive pulmonary disease.[19] CARB states that much of the information on distribution in air, human exposure and dose, and health effects is specifically for NO_2 and there is only limited information for NO and NO_X, as well as large uncertainty in relating health effects to NO or NO_X exposure.[20]

(d) Carbon Monoxide (CO)

Carbon monoxide (CO) is primarily emitted from combustion processes and motor vehicles due to the incomplete combustion of fuel, such as natural gas, gasoline, or wood, with the majority of outdoor CO emissions from mobile sources.[21] According to the USEPA, breathing air with a high concentration of CO reduces the amount of oxygen that can be transported in the blood stream to critical organs like the heart and brain and at very high levels, which are possible indoors or in other enclosed environments, CO can cause dizziness, confusion, unconsciousness and death.[22] Very high levels of CO are not likely to occur outdoors; however, when CO levels are elevated outdoors, they can be of particular concern for people with some types of heart disease since these people already have a reduced ability for getting oxygenated blood to their hearts and are especially vulnerable to the effects of CO when exercising or under increased stress.[23] In these situations, short-term exposure to elevated CO may result in reduced oxygen to the heart

16 USEPA, Nitrogen Dioxide (NO_2) Pollution, https://www.epa.gov/no2-pollution/basic-information-about-no2, last updated September 8, 2016, accessed February 25, 2020.

17 CARB, Nitrogen Dioxide & Health, https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health, accessed February 25, 2020.

18 CARB, Nitrogen Dioxide & Health, https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health, accessed February 25, 2020.

19 CARB, Nitrogen Dioxide & Health, https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health, accessed February 25, 2020.

20 CARB, Nitrogen Dioxide & Health, https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health, accessed February 25, 2020.

21 CARB, Carbon Monoxide & Health, https://ww2.arb.ca.gov/resources/carbon-monoxide-and-health, accessed February 25, 2020.

22 USEPA, Carbon Monoxide (CO) Pollution in Outdoor Air, https://www.epa.gov/co-pollution/basic-information-about-carbon-monoxide-co-outdoor-air-pollution, accessed February 25, 2020.

23 USEPA, Carbon Monoxide (CO) Pollution in Outdoor Air, https://www.epa.gov/co-pollution/basic-information-about-carbon-monoxide-co-outdoor-air-pollution, accessed February 25, 2020.

accompanied by chest pain also known as angina.[24] According to CARB, the most common effects of CO exposure are fatigue, headaches, confusion, and dizziness due to inadequate oxygen delivery to the brain.[25] For people with cardiovascular disease, short-term CO exposure can further reduce their body's already compromised ability to respond to the increased oxygen demands of exercise, exertion, or stress; inadequate oxygen delivery to the heart muscle leads to chest pain and decreased exercise tolerance.[26] Unborn babies, infants, elderly people, and people with anemia or with a history of heart or respiratory disease are most likely to experience health effects with exposure to elevated levels of CO.[27]

(e) Sulfur Dioxide (SO_2)

According to the USEPA, the largest source of sulfur dioxide (SO_2) emissions in the atmosphere is the burning of fossil fuels by power plants and other industrial facilities, while smaller sources of SO_2 emissions include industrial processes, such as extracting metal from ore; natural sources, such as volcanoes; and locomotives, ships and other vehicles and heavy equipment that burn fuel with a high sulfur content.[28] In 2006, California phased-in the ultra-low-sulfur diesel regulation limiting vehicle diesel fuel to a sulfur content not exceeding 15 parts per million, down from the previous requirement of 500 parts per million, substantially reducing emissions of sulfur from diesel combustion.[29] According to the USEPA, short-term exposures to SO_2 can harm the human respiratory system and make breathing difficult.[30] According to CARB, health effects at levels near the State one-hour standard are those of asthma exacerbation, including bronchoconstriction accompanied by symptoms of respiratory irritation, such as wheezing, shortness of breath and chest tightness, especially during exercise or physical activity, and exposure at elevated levels of SO_2 (above 1 part per million (ppm)) results in increased incidence of pulmonary symptoms and disease, decreased pulmonary function, and increased risk of mortality.[31] Children, the elderly, and those with asthma,

24 USEPA, Carbon Monoxide (CO) Pollution in Outdoor Air, https://www.epa.gov/co-pollution/basic-information-about-carbon-monoxide-co-outdoor-air-pollution, accessed February 25, 2020.

25 CARB, Carbon Monoxide & Health, https://ww2.arb.ca.gov/resources/carbon-monoxide-and-health, accessed February 25, 2020.

26 CARB, Carbon Monoxide & Health, https://ww2.arb.ca.gov/resources/carbon-monoxide-and-health, accessed February 25, 2020.

27 CARB, Carbon Monoxide & Health, https://ww2.arb.ca.gov/resources/carbon-monoxide-and-health, accessed February 25, 2020.

28 USEPA, Sulfur Dioxide (SO_2) Pollution, https://www.epa.gov/so2-pollution/sulfur-dioxide-basics, last updated June 28, 2018, accessed February 25, 2020.

29 CARB, Final Regulation Order, Amendments to the California Diesel Fuel Regulations, Amend Section 2281, Title 13, California Code of Regulations, approved July 15, 2004.

30 USEPA, Sulfur Dioxide (SO_2) Pollution, https://www.epa.gov/so2-pollution/sulfur-dioxide-basics, last updated June 28, 2018, accessed February 25, 2020.

31 CARB, Sulfur Dioxide & Health, https://ww2.arb.ca.gov/resources/sulfur-dioxide-and-health, accessed February 25, 2020.

cardiovascular disease, or chronic lung disease (such as bronchitis or emphysema) are most likely to experience the adverse effects of SO_2.[32,33]

(f) Particulate Matter (PM10 and PM2.5)

Particulate matter air pollution is a mixture of solid particles and liquid droplets found in the air.[34] Some particles, such as dust, dirt, soot, or smoke, are large or dark enough to be seen with the naked eye, while other particles are so small they can only be detected using an electron microscope.[35] Particles are defined by their diameter for air quality regulatory purposes: inhalable particles with diameters that are generally 10 micrometers (µm) and smaller (PM10); and fine inhalable particles with diameters that are generally 2.5 µm and smaller (PM2.5).[36] Thus, PM2.5 comprises a portion or a subset of PM10. Sources of PM10 emissions include dust from construction sites, landfills and agriculture, wildfires and brush/waste burning, industrial sources, and wind-blown dust from open lands.[37] Sources of PM2.5 emissions include combustion of gasoline, oil, diesel fuel, or wood.[38] PM10 and PM2.5 may be either directly emitted from sources (primary particles) or formed in the atmosphere through chemical reactions of gases (secondary particles), such as SO_2, NO_X, and certain organic compounds.[39] According to CARB, both PM10 and PM2.5 can be inhaled, with some depositing throughout the airways; PM_{10} is more likely to deposit on the surfaces of the larger airways of the upper region of the lung, while PM2.5 is more likely to travel into and deposit on the surface of the deeper parts of the lung, which can induce tissue damage, and lung inflammation.[40] Short-term (up to 24 hours duration) exposure to PM10 has been associated primarily with worsening of respiratory diseases, including asthma and chronic obstructive pulmonary disease, leading to hospitalization and emergency department visits.[41] The effects of long-term (months or years) exposure to PM10 are less clear, although studies suggest a link between long-term PM10 exposure and respiratory mortality. The International Agency

32 CARB, Sulfur Dioxide & Health, https://ww2.arb.ca.gov/resources/sulfur-dioxide-and-health, accessed February 25, 2020.

33 USEPA, Sulfur Dioxide (SO_2) Pollution, https://www.epa.gov/so2-pollution/sulfur-dioxide-basics, accessed February 25, 2020.

34 USEPA, Particulate Matter (PM) Pollution, https://www.epa.gov/pm-pollution/particulate-matter-pm-basics, last updated November 14, 2018, accessed February 25, 2020.

35 USEPA, Particulate Matter (PM) Pollution, https://www.epa.gov/pm-pollution/particulate-matter-pm-basics, accessed February 25, 2020.

36 USEPA, Particulate Matter (PM) Pollution, https://www.epa.gov/pm-pollution/particulate-matter-pm-basics, accessed February 25, 2020.

37 CARB, Inhalable Particulate Matter and Health (PM2.5 and PM10), https://www.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm, accessed February 25, 2020.

38 CARB, Inhalable Particulate Matter and Health (PM2.5 and PM10), https://www.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm, accessed February 25, 2020.

39 CARB, Inhalable Particulate Matter and Health (PM2.5 and PM10), https://www.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm, accessed February 25, 2020.

40 CARB, Inhalable Particulate Matter and Health (PM2.5 and PM10), https://www.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm, accessed February 25, 2020.

41 CARB, Inhalable Particulate Matter and Health (PM2.5 and PM10), https://www.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm, accessed February 25, 2020.

for Research on Cancer published a review in 2015 that concluded that particulate matter in outdoor air pollution causes lung cancer.[42] Short-term exposure to PM2.5 has been associated with premature mortality, increased hospital admissions for heart or lung causes, acute and chronic bronchitis, asthma attacks, emergency room visits, respiratory symptoms, and restricted activity days and long-term exposure to PM2.5 has been linked to premature death, particularly in people who have chronic heart or lung diseases, and reduced lung function growth in children.[43] According to CARB, populations most likely to experience adverse health effects with exposure to PM10 and PM2.5 include older adults with chronic heart or lung disease, children, and asthmatics and children and infants are more susceptible to harm from inhaling pollutants such as PM10 and PM2.5 compared to healthy adults because they inhale more air per pound of body weight than do adults, spend more time outdoors, and have developing immune systems.[44]

(g) Lead (Pb)

Major sources of lead emissions include ore and metals processing, piston-engine aircraft operating on leaded aviation fuel, waste incinerators, utilities, and lead-acid battery manufacturers.[45] In the past, leaded gasoline was a major source of lead emissions; however, the removal of lead from gasoline has resulted in a decrease of lead in the air by 98 percent between 1980 and 2014.[46] Lead can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems and the cardiovascular system, and affects the oxygen carrying capacity of blood.[47] The lead effects most commonly encountered in current populations are neurological effects in children, such as behavioral problems and reduced intelligence, anemia, and liver or kidney damage.[48] Excessive lead exposure in adults can cause reproductive problems in men and women, high blood pressure, kidney disease, digestive problems, nerve disorders, memory and concentration problems, and muscle and joint pain.[49]

42 CARB, Inhalable Particulate Matter and Health (PM2.5 and PM10), https://www.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm, accessed February 25, 2020.

43 CARB, Inhalable Particulate Matter and Health (PM2.5 and PM10), https://www.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm, accessed February 25, 2020.

44 CARB, Inhalable Particulate Matter and Health (PM2.5 and PM10), https://www.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm, accessed February 25, 2020.

45 USEPA, Lead Air Pollution, https://www.epa.gov/lead-air-pollution/basic-information-about-lead-air-pollution, accessed February 25, 2020.

46 USEPA, Lead Air Pollution, https://www.epa.gov/lead-air-pollution/basic-information-about-lead-air-pollution, accessed February 25, 2020.

47 USEPA, Lead Air Pollution, https://www.epa.gov/lead-air-pollution/basic-information-about-lead-air-pollution, accessed February 25, 2020.

48 CARB, Lead & Health, https://ww2.arb.ca.gov/resources/lead-and-health, accessed February 25, 2020.

49 CARB, Lead & Health, https://ww2.arb.ca.gov/resources/lead-and-health, accessed February 25, 2020.

(2) Other Criteria Pollutants (California Only)

The California Ambient Air Quality Standards (CAAQS) regulate the same criteria pollutants as the National Ambient Air Quality Standards (NAAQS) but, in addition, regulate State-identified criteria pollutants, including sulfates, hydrogen sulfide, visibility-reducing particles, and vinyl chloride.[50] A description of the health effects of the State-identified criteria air pollutants relevant to the Project is provided below. As the Project would not generate emissions of hydrogen sulfide or vinyl chloride, they are not discussed.

(a) Sulfates (SO_4^{2-})

Sulfates in the environment occur as a result of SO_2 (sulfur dioxide) being converted to SO_4^{2-} compounds in the atmosphere where sulfur is first oxidized to SO_2 during the combustion process of sulfur containing, petroleum-derived fuels (e.g., gasoline and diesel fuel).[51] Exposure to SO_4^{2-}, which are part of PM2.5, results in health effects similar to those from exposure to PM2.5 including reduced lung function, aggravated asthmatic symptoms, and increased risk of emergency department visits, hospitalizations, and death in people who have chronic heart or lung diseases.[52] Population groups with higher risks of experiencing adverse health effects with exposure to SO_4^{2-} include children, asthmatics, and older adults who have chronic heart or lung diseases.[53]

(b) Visibility-Reducing Particles

Visibility-reducing particles come from a variety of natural and manmade sources and can vary greatly in shape, size and chemical composition. Visibility reduction is caused by the absorption and scattering of light by the particles in the atmosphere before it reaches the observer. Certain visibility-reducing particles are directly emitted to the air, such as windblown dust and soot, while others are formed in the atmosphere through chemical transformations of gaseous pollutants (e.g., sulfates, nitrates, organic carbon particles), which are the major constituents of particulate matter. As the number of visibility reducing particles increases, more light is absorbed and scattered, resulting in less clarity, color, and visual range.[54] Exposure to some haze-causing pollutants have been linked to adverse health impacts similar to PM10 and PM2.5 as discussed above.[55]

50 CARB, California Ambient Air Quality Standards, https://ww2.arb.ca.gov/resources/california-ambient-air-quality-standards, accessed February 26, 2020.

51 CARB, Sulfate & Health, https://ww2.arb.ca.gov/resources/sulfate-and-health, accessed February 25, 2020.

52 CARB, Sulfate & Health, https://ww2.arb.ca.gov/resources/sulfate-and-health, accessed February 25, 2020.

53 CARB, Sulfate & Health, https://ww2.arb.ca.gov/resources/sulfate-and-health, accessed February 25, 2020.

54 CARB, Visibility-Reducing Particles and Health, https://www.arb.ca.gov/research/aaqs/common-pollutants/vrp/vrp.htm, last reviewed October 11, 2016, accessed February 25, 2020.

55 CARB, Visibility-Reducing Particles and Health, https://www.arb.ca.gov/research/aaqs/common-pollutants/vrp/vrp.htm, last reviewed October 11, 2016, accessed February 25, 2020.

(3) Toxic Air Contaminants

In addition to criteria pollutants, the South Coast Air Quality Management District (SCAQMD) periodically assesses levels of toxic air contaminants (TACs) in the South Coast Air Basin (Air Basin). A TAC is defined by California Health and Safety Code Section 39655:

> *"Toxic air contaminant" means an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health. A substance that is listed as a hazardous air pollutant pursuant to subsection (b) of Section 112 of the federal act (42 U.S.C. Sec. 7412(b)) is a toxic air contaminant.*

Diesel particulate matter (DPM), which is emitted in the exhaust from diesel engines, was listed by the State as a TAC in 1998. Most major sources of diesel emissions, such as ships, trains, and trucks operate in and around ports, railyards, and heavily traveled roadways. These areas are often located near highly populated areas resulting in greater health consequences for urban areas than rural areas.[56] DPM has historically been used as a surrogate measure of exposure for all diesel exhaust emissions. DPM consists of fine particles (fine particles have a diameter <2.5 µm), including a subgroup of ultrafine particles (ultrafine particles have a diameter <0.1 µm). Collectively, these particles have a large surface area which makes them an excellent medium for absorbing organics. The visible emissions in diesel exhaust include carbon particles or "soot." Diesel exhaust also contains a variety of harmful gases and cancer-causing substances.

Exposure to DPM may be a health hazard, particularly to children whose lungs are still developing and the elderly who may have other serious health problems. DPM levels and resultant potential health effects may be higher in proximity to heavily traveled roadways with substantial truck traffic or near industrial facilities. According to CARB, DPM exposure may lead to the following adverse health effects: (1) aggravated asthma; (2) chronic bronchitis; (3) increased respiratory and cardiovascular hospitalizations; (4) decreased lung function in children; (5) lung cancer; and (6) premature deaths for people with heart or lung disease.[57,58]

56 CARB, Overview: Diesel Exhaust and Health, https://www.arb.ca.gov/research/diesel/diesel-health.htm, accessed February 25, 2020.

57 CARB, Diesel and Health Research, http://www.arb.ca.gov/research/diesel/diesel-health.htm, accessed February 25, 2020.

58 CARB, Diesel Particulate Matter Health Risk Assessment Study for the West Oakland Community: Preliminary Summary of Results, 2008.

b) Regulatory Framework

(1) Federal

The Federal Clean Air Act of 1963 was the first federal legislation regarding air pollution control and has been amended numerous times in subsequent years, with the most recent amendments occurring in 1990.[59] The USEPA is responsible for the implementation and enforcement of the CAA, which establishes the NAAQS, specifies future dates for achieving compliance, and requires USEPA to designate areas as attainment, nonattainment, or maintenance. The CAA also mandates that each state submit and implement a State Implementation Plan (SIP) for each criteria pollutant for which the State has not achieved the applicable NAAQS. The SIP includes pollution control measures that demonstrate how the standards for those pollutants will be met. The sections of the CAA most applicable to the Project include Title I (Nonattainment Provisions) and Title II (Mobile Source Provisions).[60,61]

Title I requirements are implemented for the purpose of attaining NAAQS for criteria air pollutants. The NAAQS were amended in July 1997 to include an 8-hour standard for ozone and to adopt a NAAQS for PM2.5. The NAAQS were also amended in September 2006 to include an established methodology for calculating PM2.5, as well as to revoke the annual PM10 threshold. **Table IV.B-1**, *Ambient Air Quality Standards*, shows the NAAQS currently in effect for each criteria pollutant. The NAAQS and the CAAQS for the California criteria air pollutants (discussed below) have been set at levels considered safe to protect public health, including the health of sensitive populations, such as asthmatics, children, and the elderly with a margin of safety; and to protect public welfare, including against decreased visibility and damage to animals, crops, vegetation, and buildings.[62]

59 USEPA, Summary of the Clean Air Act, https://www.epa.gov/laws-regulations/summary-clean-air-act, accessed February 25, 2020.

60 USEPA, Clean Air Act Overview, Clean Air Act Table of Contents by Title, last updated January 3, 2017, https://www.epa.gov/clean-air-act-overview/clean-air-act-text, accessed February 25, 2020. As shown therein, Title I addresses nonattainment areas and Title II addresses mobile sources.

61 Mobile sources include on-road vehicles (e.g., cars, buses, motorcycles) and non-road vehicles (e.g., aircraft, trains, construction equipment). Stationary sources are comprised of both point and area sources. Point sources are stationary facilities that emit large amount of pollutants (e.g., municipal waste incinerators, power plants). Area sources are smaller stationary sources that alone are not large emitters but combined can account for large amounts of pollutants (e.g., consumer products, residential heating, dry cleaners).

62 USEPA, NAAQS Table, https://www.epa.gov/criteria-air-pollutants/naaqs-table, accessed February 25, 2020.

TABLE IV.B-1
AMBIENT AIR QUALITY STANDARDS

		California Standards [a]	National Standards [b]	
Pollutant	**Average Time**	**Concentration [c]**	**Primary [c,d]**	**Secondary [c,e]**
O_3 [f]	1 Hour	0.09 ppm (180 µg/m^3)	—	Same as Primary Standard
	8 Hour	0.070 ppm (137 µg/m^3)	0.070 ppm (137 µg/m^3)	
NO_2 [g]	1 Hour	0.18 ppm (339 µg/m^3)	100 ppb (188 µg/m^3)	None
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	53 ppb (100 µg/m^3)	Same as Primary Standard
CO	1 Hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)	None
	8 Hour	9.0 ppm (10 mg/m^3)	9 ppm (10 mg/m^3)	
SO_2 [h]	1 Hour	0.25 ppm (655 µg/m^3)	75 ppb (196 µg/m^3)	—
	3 Hour	—	—	0.5 ppm (1300 µg/m^3)
	24 Hour	0.04 ppm (105 µg/m^3)	0.14 ppm (for certain areas) [h]	—
	Annual Arithmetic Mean	—	0.030 ppm (for certain areas) [h]	—
PM10 [i]	24 Hour	50 µg/m^3	150 µg/m^3	Same as Primary Standard
	Annual Arithmetic Mean	20 µg/m^3	—	
PM2.5 [i]	24 Hour	No Separate State Standard	35 µg/m^3	Same as Primary Standard
	Annual Arithmetic Mean	12 µg/m^3	12.0 µg/m^3 [i]	15 µg/m^3
Lead [j,k]	30 Day Average	1.5 µg/m^3	—	
	Calendar Quarter	—	1.5 µg/m^3 (for certain areas) [k]	Same as Primary Standard
	Rolling 3-Month Average [k]	—	0.15 µg/m^3	
Visibility Reducing Particles [l]	8 Hour	Extinction coefficient of 0.23 per kilometer — visibility of ten miles or more due to particles when relative humidity is less than 70 percent.	**No Federal Standards**	
Sulfates (SO_4)	24 Hour	25 µg/m^3	**No Federal Standards**	
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)	**No Federal Standards**	
Vinyl Chloride [j]	24 Hour	0.01 ppm (26 µg/m^3)	**No Federal Standards**	

TABLE IV.B-1
AMBIENT AIR QUALITY STANDARDS

Pollutant	Average Time	California Standards [a] Concentration [c]	National Standards [b] Primary [c,d]	National Standards [b] Secondary [c,e]

[a] California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM10, PM2.5, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

[b] National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 micrograms/per cubic meter ($\mu g/m^3$) is equal to or less than one. For PM2.5, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.

[c] Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

[d] National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

[e] National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

[f] On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

[g] To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb.

[h] On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated non-attainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

[i] On December 14, 2012, the national annual $PM_{2.5}$ primary standard was lowered from 15 $\mu g/m^3$ to 12.0 $\mu g/m^3$.

[j] CARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

[k] The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 $\mu g/m^3$ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated non-attainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

[l] In 1989, CARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

SOURCE: CARB, Ambient Air Quality Standards, May 4, 2016.

In addition to criteria pollutants, Title I also includes air toxics provisions which require USEPA to develop and enforce regulations to protect the public from exposure to airborne contaminants that are known to be hazardous to human health. In accordance with Section 112, USEPA establishes National Emission Standards for Hazardous Air Pollutants (NESHAPs). The list of hazardous air pollutants (HAPs), or air toxics, includes specific compounds that are known or suspected to cause cancer or other serious health effects.

Title II requirements pertain to mobile sources, such as cars, trucks, buses, and planes. Reformulated gasoline, automobile pollution control devices, and vapor recovery nozzles

on gas pumps are a few of the mechanisms the USEPA uses to regulate mobile air emission sources. The provisions of Title II have resulted in tailpipe emission standards for vehicles, which have been strengthened in recent years to improve air quality. For example, the standards for NO_X emissions have been lowered substantially, and the specification requirements for cleaner burning gasoline are more stringent.

(2) State

(a) California Clean Air Act

The CCAA, signed into law in 1988, requires all areas of the State to achieve and maintain the CAAQS by the earliest practical date. The CAAQS are established to protect the health of the most sensitive groups and apply to the same criteria pollutants as the federal CAA and also includes State-identified criteria pollutants, which are sulfates, visibility-reducing particles, hydrogen sulfide, and vinyl chloride.[63] CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both federal and State air pollution control programs within California.[64] In this capacity, CARB conducts research, sets the CAAQS, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hairspray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. CARB has primary responsibility for the development of California's SIP, for which it works closely with the federal government and the local air districts. The SIP is required for the State to take over implementation of the federal CAA from the USEPA.

(b) On-Road and Off-Road Vehicle Rules

In 2004, CARB adopted an Airborne Toxic Control Measure (ATCM) to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to DPM and other TACs (Title 13 CCR, Section 2485). The California Code of Regulations (CCR) is the official compilation and publication of regulations adopted, amended or repealed by the State agencies pursuant to the Administrative Procedure Act. The CCR includes regulations that pertain to air quality emissions. Specifically, Section 2485 in Title 13 of the CCR states that the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location. In addition, Section 93115 in Title 17 of the CCR states that operations of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emissions standards.

In 2008, CARB approved the Truck and Bus regulation to reduce NO_X, PM10, and PM2.5 emissions from existing diesel vehicles operating in California (13 CCR, Section 2025). The requirements were amended to apply to nearly all diesel-fueled trucks and buses

63 CARB, California Ambient Air Quality Standards (CAAQS), last reviewed August 10, 2017.
64 Chapter 1568 of the Statutes of 1988.

with a GVWR greater than 14,000 pounds. For the largest trucks in the fleet, those with a GVWR greater than 26,000 pounds must comply with a schedule by engine model year or owners can report to show compliance with more flexible options, such as the installation of PM filters or low-use exemption.

In addition to limiting exhaust from idling trucks, CARB also adopted emission standards for off-road diesel construction equipment of greater than 25 horsepower, such as bulldozers, loaders, backhoes and forklifts, as well as many other self-propelled off-road diesel vehicles. The In-Use Off-Road Diesel Fueled Fleets regulation adopted by the CARB on July 26, 2007, aims to reduce emissions by the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission controlled models (13 CCR, Section 2449). Implementation is staggered based on fleet size (which is the total of all off-road horsepower under common ownership or control), with the largest fleets beginning compliance in 2014, medium fleets in 2017, and small fleets in 2019. Each fleet must demonstrate compliance through one of two methods. The first option is to calculate and maintain fleet average emissions targets, which encourages the retirement or repowering of older equipment and rewards the introduction of newer cleaner units into the fleet. The second option is to meet the Best Available Control Technology (BACT) requirements by turning over or installing Verified Diesel Emission Control Strategies (VDECS) on a certain percentage of its total fleet horsepower. The compliance schedule requires that BACT turn overs or retrofits (VDECS installation) be fully implemented by 2023 in all equipment for large and medium fleets and by 2028 for small fleets.

(c) California Air Toxics Program

The California Air Toxics Program was established in 1983, when the California Legislature adopted AB 1807 to establish a two-step process of risk identification and risk management to address potential health effects from exposure to toxic substances in the air. In the risk identification step, CARB and the Office of Environmental Health Hazard Assessment (OEHHA) determine if a substance should be formally identified, or "listed", as a TAC in California. Since inception of the program, a number of such substances have been listed (www.arb.ca.gov/toxics.id/taclist.htm). In 1993, the California Legislature amended the program to identify the 189 federal hazardous air pollutants (HAPs) as TACs. The SCAQMD has not adopted guidance applicable to land use projects that requires a quantitative health risk assessment be performed for construction exposures to TAC emissions.[65]

In the risk management step, CARB reviews emission sources of an identified TAC to determine whether regulatory action is needed to reduce risk. Based on the results of that

65 South Coast Air Quality Management District (SCAQMD), Final Environmental Assessment for Proposed Amended Rule 307.1 – Alternative Fees for Air Toxics Emissions Inventory; Proposed Amended Rule 1401 – New Source Review of Toxic Air Contaminants; Proposed Amended Rule 1402 – Control of Toxic Air Contaminants from Existing Sources; SCAQMD Public Notification Procedures for Facilities Under the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588) and Rule 1402.

review, CARB has promulgated a number of ATCMs, both for mobile and stationary sources. As discussed above, in 2004, CARB adopted an ATCM to limit idling of heavy-duty diesel motor vehicles weighing greater than 10,000 pounds to no more than 5 minutes at any location in order to reduce public exposure to DPM and other TACs.

The AB 1807 program is supplemented by the AB 2588 Air Toxics "Hot Spots" program, which was established by the California Legislature in 1987. Under this program, facilities are required to report their air toxics emissions, assess health risks, and notify nearby residents and workers of significant risks if present. In 1992, the AB 2588 program was amended by Senate Bill (SB) 1731 to require facilities that pose a significant health risk to the community to reduce their risk through implementation of a risk management plan.

(3) Regional

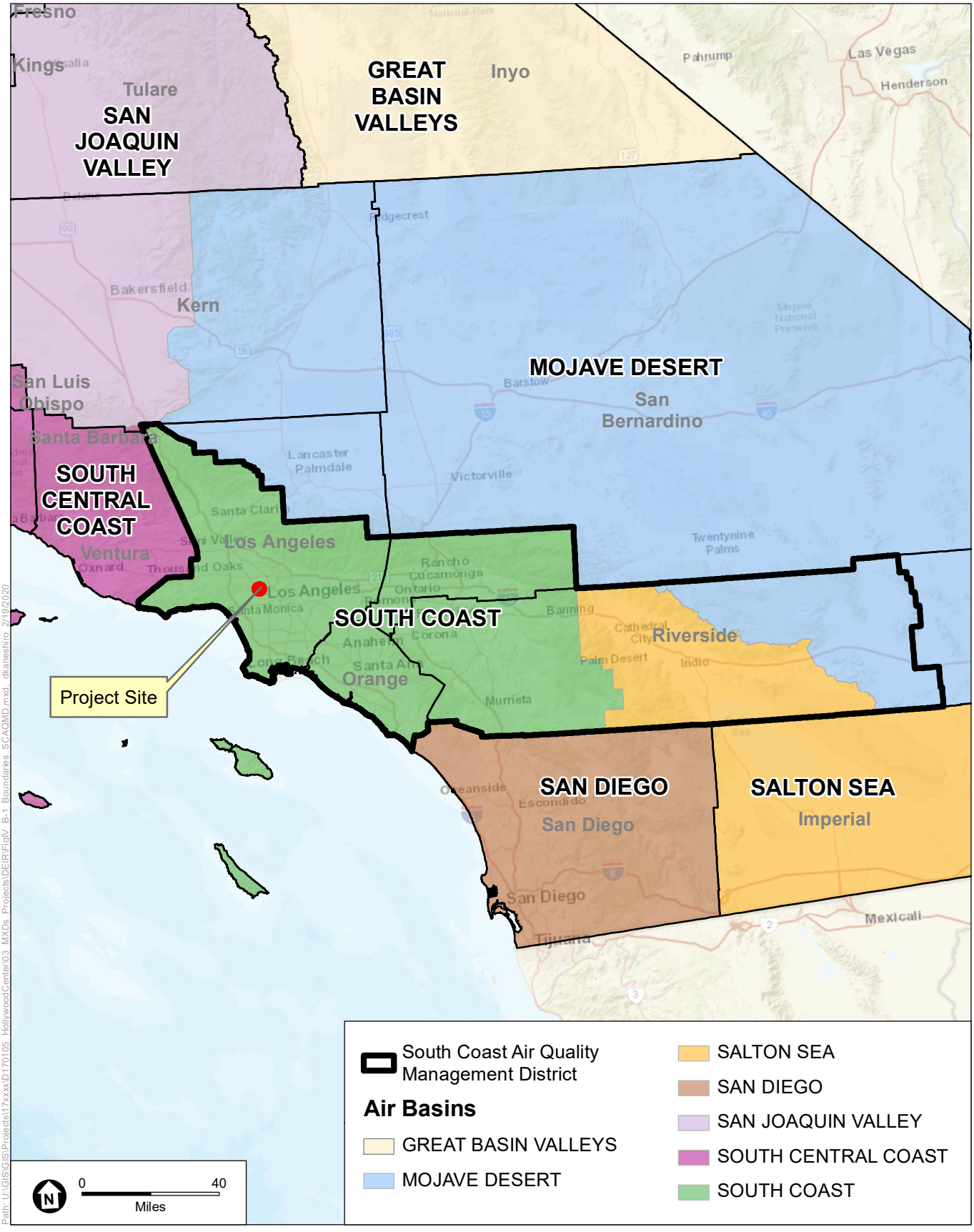
(a) South Coast Air Quality Management District

The SCAQMD is primarily responsible for planning, implementing, and enforcing air quality standards for the South Coast Air Basin (Air Basin), which includes all of Orange County; Los Angeles County (excluding the Antelope Valley portion); the western, non-desert portion of San Bernardino County; and the western Coachella Valley and San Gorgonio Pass portions of Riverside County. The Air Basin is an approximately 6,745-square-mile area bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Air Basin is a subregion within the western portion of the SCAQMD jurisdiction. **Figure IV.B-1**, *Boundaries of the South Coast Air Quality Management District*, illustrates the location of the Air Basin. While air quality in the Air Basin has improved, the Air Basin requires continued diligence to meet the air quality standards.

(i) Air Quality Management Plan

The SCAQMD has adopted Air Quality Management Plans (AQMPs) to meet the CAAQS and NAAQS. The 2012 AQMP incorporates scientific and technological information and planning assumptions, including regional growth projections[66] to achieve federal standards for air quality in the Air Basin. The 2012 AQMP incorporates a comprehensive strategy aimed at controlling pollution from all sources, including stationary sources, and on-road and off-road mobile sources. The 2012 AQMP includes new and changing federal requirements, implementation of new technology measures, and the continued development of economically sound, flexible compliance approaches. Additionally, the 2012 AQMP highlights the significant amount of emission reductions needed and the urgent need to identify additional strategies, especially in the area of mobile sources, to meet all federal criteria pollutant standards within the timeframes allowed under the federal CAA.

66 SCAQMD, 2012 Air Quality Management Plan (AQMP), 2013.



SOURCE: California Air Resources Board, March 2004

Hollywood Center Project

Figure IV.B-1
Boundaries of the South Coast Air Quality Management District

The key undertaking of the 2012 AQMP is to bring the Air Basin into attainment with the NAAQS for the 24-hour PM2.5 standard. The 2012 AQMP also intensifies the scope and pace of continued air quality improvement efforts toward meeting the 2024 8-hour O_3 standard deadline with new measures designed to reduce reliance on the federal CAA Section 182(e)(5) long-term measures for NO_X and VOC reductions. The SCAQMD expects exposure reductions to be achieved through implementation of new and advanced control technologies, as well as improvement of existing technologies.

The control measures in the 2012 AQMP consist of 4 components: (1) Basin-wide and Episodic Short-term PM2.5 Measures; (2) Contingency Measures; (3) 8-hour Ozone Implementation Measures; and (4) Transportation and Control Measures provided by the Southern California Association of Governments (SCAG). The Plan includes eight short-term $PM_{2.5}$ control measures, 16 stationary source 8-hour ozone measures, 10 early-action measures for mobile sources and 7 early-action measures to accelerate near-zero and zero emission technologies for goods movement-related sources, and 5 on-road and 5 off-road mobile source control measures.

In general, SCAQMD's control strategy for stationary and mobile sources is based on the following approaches: (1) available cleaner technologies; (2) best management practices; (3) incentive programs; (4) development and implementation of zero- and near-zero technologies and vehicles and control methods; and (5) emission reductions from mobile sources. Control strategies in the AQMP with potential applicability to reducing short-term emissions from construction activities associated with the Project include strategies denoted in the AQMP as ONRD-04 and OFFRD-01, which are intended to reduce emissions from on-road and off-road heavy-duty vehicles and equipment.[67] Descriptions of measures ONRD-04 and OFFRD-01 are provided below:

- **ONRD-04 – Accelerated Retirement of Older On-Road Heavy-Duty Vehicles:** This measure seeks to replace up to 1,000 heavy-duty vehicles per year with newer or new vehicles that at a minimum, meet the 2010 on-road heavy-duty NO_X exhaust emissions standard of 0.2 grams per brake horsepower-hour (g/bhp-hr).
- **OFFRD-01 – Extension of the Soon Provision for Construction/Industrial Equipment:** This measure continues the Surplus Off-Road Option for NO_X (SOON) provision of the Statewide In-Use Off-Road Fleet Vehicle Regulation beyond 2014 through the 2023 timeframe.

The SCAQMD released its Draft 2016 AQMP on June 30, 2016, for public review and comment, and a revised Draft 2016 in October 2016. The SCAQMD Governing Board adopted the 2016 AQMP on March 3, 2017.[68] CARB approved the 2016 AQMP on March

67 SCAQMD, 2012 AQMP, February 2013.
68 SCAQMD, 2016 AQMP, March 2017.

23, 2017.[69] Key elements of the 2016 AQMP include implementing fair-share emissions reductions strategies at the federal, state, and local levels; establishing partnerships, funding, and incentives to accelerate deployment of zero and near-zero-emissions technologies; and taking credit from co-benefits from greenhouse gas, energy, transportation and other planning efforts.[70] The strategies included in the 2016 AQMP are intended to demonstrate attainment of the NAAQS, which are set at levels considered safe to protect public health, including the health of sensitive populations, such as asthmatics, children, and the elderly with a margin of safety; and to protect public welfare, including against decreased visibility and damage to animals, crops, vegetation, and buildings,[71] for the federal non-attainment pollutants ozone and PM2.5 while accounting for regional growth, increasing development, and maintaining a healthy economy.[72] The 2016 AQMP is used in the analyses in this section, since it has been adopted by both SCAQMD and CARB. The 2016 AQMP incorporates the above-listed 2012 AQMP control strategies, which are designated as MOB-08 and MOB-10.[73]

(ii) SCAQMD Rules and Regulations

The SCAQMD has adopted rules and regulations to sources of air pollution in the Air Basin and to help achieve air quality standards. The following SCAQMD rules and regulations may be applicable to the Project:

Regulation IV – Prohibitions: This regulation sets forth the restrictions for visible emissions, odor nuisance, fugitive dust, various air emissions, fuel contaminants, start-up/shutdown exemptions and breakdown events, including the following rules:

- **Rule 401 – Visible Emissions:** This rule states that a person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart or of such opacity as to obscure an observer's view.
- **Rule 402 – Nuisance:** This rule states 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.

69 CARB, News Release - CARB establishes next generation of emission controls needed to improve state's air quality**,** https://ww2.arb.ca.gov/news/carb-establishes-next-generation-emission-controls-needed-improve-states-air-quality, accessed February 25, 2020.
70 SCAQMD, 2016 AQMP, March 2017.
71 USEPA, NAAQS Table, https://www.epa.gov/criteria-air-pollutants/naaqs-table, accessed February 25, 2020.
72 SCAQMD, NAAQS/CAAQS and Attainment Status for South Coast Air Basin, 2016.
73 SCAQMD, 2016 AQMP, March 2017.

- **Rule 403 – Fugitive Dust:** This rule requires projects to prevent, reduce or mitigate fugitive dust emissions from a site. Rule 403 restricts visible fugitive dust to the project property line, restricts the PM10 emissions to less than 50 micrograms per cubic meter (µg/m3) and restricts the tracking out of bulk materials onto public roads. Additionally, projects must utilize one or more of the best available control measures (identified in the tables within the rule). Mitigation measures may include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers and/or ceasing all activities.

Regulation XI – Source Specific Standards: Regulation XI sets emissions standards for specific sources, including the following rules:

- **Rule 1113 – Architectural Coatings:** This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.
- **Rule 1121 – Control of Nitrogen Oxides from Residential Type, Natural Gas-Fired Water Heaters:** This rule specifies NO_X emission limits for natural gas-fired water heaters, with heat input rates less than 75,000 British thermal units (BTUs) per hour.
- **Rule 1138 – Control of Emissions from Restaurant Operations:** This rule specifies PM and VOC emissions and odor control requirements for commercial cooking operations that use chain-driven charbroilers to cook meat.
- **Rule 1146.1 – Emissions of Oxides of Nitrogen from Small Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters:** This rule requires manufacturers, distributors, retailers, refurbishers, installers, and operators of new and existing units to reduce NO_X emissions from natural gas-fired boilers, steam generators, and process heaters as defined in this rule.
- **Rule 1146.2 – Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters:** This rule requires manufacturers, distributors, retailers, refurbishers, installers, and operators of new and existing units to reduce NO_X emissions from natural gas-fired water heaters, boilers, and process heaters as defined in this rule.
- **Rule 1186 – PM10 Emissions from Paved and Unpaved Roads, and Livestock Operations:** This rule applies to owners and operators of paved and unpaved roads and livestock operations. The rule is intended to reduce PM10 emissions by requiring the cleanup of material deposited onto paved roads, use of certified street sweeping equipment, and treatment of high-use unpaved roads (see also Rule 403).

Regulation XIV – Toxics and Other Non-Criteria Pollutants: Regulation XIV sets requirements for new permit units, relocations, or modifications to existing permit units which emit toxic air contaminants or other non-criteria pollutants, including the following rules:

- **Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities:** This rule requires owners and operators of any demolition or renovation activity and the

associated disturbance of asbestos-containing materials (ACMs), any asbestos storage facility, or any active waste disposal site to implement work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of ACMs.

- **Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines:** This rule applies to stationary compression ignition (CI) engine greater than 50 brake horsepower and sets limits on emissions and operating hours. In general, new stationary emergency standby diesel-fueled engines greater than 50 brake horsepower are not permitted to operate more than 50 hours per year for maintenance and testing.

- **Rule 1401 and Rule 1402 – New Source Review of Toxic Air Contaminants and Control of Toxic Air Contaminants from Existing Sources:** SCAQMD has adopted two rules to limit cancer and non-cancer health risks from facilities located within its jurisdiction. Rule 1401 (New Source Review of Toxic Air Contaminants) regulates new or modified facilities, and Rule 1402 (Control of Toxic Air Contaminants from Existing Sources) regulates facilities that are already operating. Rule 1402 incorporates the requirements of the AB 2588 program, including implementation of risk reduction plans for significant risk facilities.

(b) Southern California Association of Governments 2016-2040 RTP/SCS

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. SCAG is the federally designated Metropolitan Planning Organization (MPO) for the majority of the Southern California region and is the largest MPO in the nation.

Pursuant to California Health and Safety Code Section 40460, SCAG is responsible for preparing and approving the portions of the AQMP relating to regional demographic projections and integrated regional land use, housing, employment and transportation programs, measures and strategies.[74] With regard to air quality planning, SCAG adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS) in April 2016, which contains such regional development and growth forecasts. These regional development and growth forecasts form the basis for the land use and transportation control portions of the 2016 AQMP, and its growth forecasts were utilized in the preparation of the air quality forecasts and consistency analysis included in the 2016 AQMP.[75] Both the 2016-2040 RTP/SCS and the AQMP are based on projections that originate with local jurisdictions.

SCAG's SCS provides specific implementation strategies. These strategies include supporting projects that encourage infill development, diverse job opportunities for a

74 SCAQMD, 2016 AQMP, March 2017, p. 4-42.
75 SCAQMD, 2016 AQMP, March 2017, p. 4-42.

variety of skills and education, recreation, cultures, and a full-range of shopping, entertainment and services all within a relatively short distance; encouraging employment development around current and planned transit stations and neighborhood commercial centers. The 2016-2040 RTP/SCS emphasizes the importance of focusing on high density development in High Quality Transit Areas (HQTAs), which SCAG defines as areas within a half mile of a well-serviced transit stop, that allows for high quality housing with consideration of urban design, construction and durability, and potential increased ridership on important public transit investments, and can help the region achieve greater mobility, an improved economy and sustainable growth.[76]

(4) Local

(a) City of Los Angeles Air Quality Element

Local jurisdictions, such as the City of Los Angeles (City), have the authority and responsibility to reduce air pollution through their land use decision-making authority. Specifically, the City is responsible for the assessment and mitigation of air emissions resulting from its land use decisions. The City's General Plan Air Quality Element was adopted on November 24, 1992, and sets forth the goals, objectives, and policies which guide the City in its implementation of its air quality improvement programs and strategies. A number of these goals, objectives, and policies are relevant to the Project and relate to traffic mobility, minimizing particulate emissions from construction activities, discouraging single-occupancy vehicle trips, managing traffic congestion during peak hours, and increasing energy efficiency in private developments.

The Air Quality Element establishes six goals:

- Good air quality in an environment of continued population growth and healthy economic structure;
- Less reliance on single-occupant vehicles with fewer commute and non-work trips;
- Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand-management techniques;
- Minimal impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation and air quality;
- Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels and the implementation of conservation measures including passive measures such as site orientation and tree planting; and
- Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution

The City is also responsible for the implementation of transportation control measures as outlined in the AQMP. Through capital improvement programs, local governments can

[76] SCAG, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS), April 2016, p. 8.

fund infrastructure that contributes to improved air quality by requiring such improvements as bus turnouts as appropriate, installation of energy-efficient streetlights, and synchronization of traffic signals. In accordance with CEQA requirements and the CEQA review process, the City assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation measures.

To achieve these goals, performance-based standards have been adopted to provide flexibility in implementation of the policies and objectives of the Air Quality Element.

The following goals, objectives, and policies from the Air Quality Element of the General Plan are applicable to the Project:

Goal 1: Good air quality and mobility in an environment of continued population growth and healthy economic structure.

Objective 1.1: It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan, increase traffic mobility, and sustain economic growth citywide.

Objective 1.3: It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.

Policy 1.3.1: Minimize particulate emissions from construction sites.

Policy 1.3.2: Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.

Goal 2: Less reliance on single-occupant vehicles with fewer commute and non-work trips.

Objective 2.1: It is the objective of the City of Los Angeles to reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals.

Policy 2.1.1: Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce Vehicle Trips and/or Vehicle Miles Traveled (VMT) as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.

Policy 2.2.2: Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.

Goal 4: Minimize impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.

Objective 4.1: It is the objective of the City of Los Angeles to include regional attainment of ambient air quality standards as a primary consideration in land use planning.

Policy 4.1.1: Coordinate with all appropriate regional agencies in the implementation of strategies for the integration of land use, transportation, and air quality policies.

Objective 4.2: It is the objective of the City of Los Angeles to reduce vehicle trips and vehicle miles traveled associated with land use patterns.

Policy 4.2.2: Improve accessibility for the City's residents to places of employment, shopping centers, and other establishments.

Policy 4.2.3: Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.

Policy 4.2.4: Require that air quality impacts be a consideration in the review and approval of all discretionary projects.

Policy 4.2.5: Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.

Goal 5: Energy efficiency through land use and transportation planning, the use of renewable resources and less polluting fuels, and the implementation of conservation measures including passive methods such as site orientation and tree planting.

Objective 5.1: It is the objective of the City of Los Angeles to increase energy efficiency of City facilities and private developments.

Policy 5.1.2: Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.

Policy 5.1.4: Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.

Objective 5.3: It is the objective of the City of Los Angeles to reduce the use of polluting fuels in stationary sources.

Policy 5.3.1: Support the development and use of equipment powered by electric or low-emitting fuels.

c) Existing Conditions

(1) Regional Context

(a) Criteria Pollutants

The extent and severity of pollutant concentrations in the Air Basin are a function of the area's natural physical characteristics (weather and topography) and man-made influences (development patterns and lifestyle). Factors, such as wind, sunlight, temperature,

humidity, rainfall, and topography all affect the accumulation and dispersion of pollutants throughout the Air Basin, making it an area of high pollution potential. The Air Basin's meteorological conditions, in combination with regional topography, are conducive to the formation and retention of ozone, which is a secondary pollutant that forms through photochemical reactions in the atmosphere. Thus, the worst air pollution conditions throughout the Air Basin typically occur from June through September. These conditions are generally attributed to the seasonally light winds and shallow vertical atmospheric mixing, which reduce the potential for the dispersal of air pollutant emissions, thereby causing elevated air pollutant levels. Pollutant concentrations in the Air Basin vary with location, season, and time of day. Concentrations of ozone, for example, tend to be lower along the coast, higher in the near inland valleys, and lower in the far inland areas of the Air Basin and adjacent desert.[77] Health and Safety Code Section 39607(e) requires CARB to establish and periodically review area designation criteria. **Table IV.B-2**, *South Coast Air Basin Attainment Status (Los Angeles County)*, shows the attainment status of the Air Basin for each criteria pollutant with respect to the State standards. The Air Basin is designated as attainment for the California standards for sulfates and unclassified for hydrogen sulfide and visibility-reducing particles.[78] The Air Basin is currently in non-attainment for O_3, PM10, and PM2.5 under the CAAQS. Since vinyl chloride is a carcinogenic toxic air contaminant, CARB does not classify attainment status for this pollutant.

As shown in Table IV.B-2, the Air Basin is designated under federal or State ambient air quality standards as nonattainment for ozone, PM10, and fine particulate matter PM2.5. The Los Angeles County portion of the Air Basin is designated as nonattainment for the federal lead standard; however, this is due to localized emissions from two lead-acid battery recycling facilities in the City of Vernon and the City of Industry that are no longer operating.[79]

As detailed in the AQMP, the major sources of air pollution in the Air Basin are divided into four major source classifications: point, and area stationary sources, and on-road and off-road mobile sources. Point and area sources are the two major subcategories of stationary sources.[80] Point sources are permitted facilities that contain one or more emission sources at an identified location (e.g., power plants, refineries, emergency generator exhaust stacks). Area sources consist of many small emission sources (e.g., residential water heaters, architectural coatings, consumer products, restaurant charbroilers, and permitted sources, such as large boilers) which are distributed across the region. Mobile sources consist of two main subcategories: On-road sources (e.g., cars and trucks) and off-road sources (e.g., heavy construction equipment).

77 SCAQMD, 2016 AQMP, March 2017.

78 Unclassified is the category designation of an area for a pollutant with insufficient data. CARB, State Area Designations Definitions, https://ww3.arb.ca.gov/desig/adm/define.htm, last reviewed May 5, 2016, accessed February 4, 2020.

79 SCAQMD, Board Meeting, Agenda No. 30, Adopt the 2012 Lead State Implementation Plan for Los Angeles County, May 4, 2012.

80 SCAQMD, 2016 AQMP, March 2017, p. 3-32.

TABLE IV.B-2
SOUTH COAST AIR BASIN ATTAINMENT STATUS (LOS ANGELES COUNTY)

Pollutant	National Standards (NAAQS)	California Standards (CAAQS)
O_3 (1-hour standard)	N/A [a]	Non-attainment – Extreme
O_3 (8-hour standard)	Non-attainment – Extreme	Non-attainment
CO	Attainment	Attainment
NO_2	Attainment	Attainment
SO_2	Attainment	Attainment
PM10	Attainment	Non-attainment
PM2.5	Non-attainment – Serious	Non-attainment
Lead (Pb)	Non-attainment (Partial) [b]	Attainment
Visibility Reducing Particles	N/A	Unclassified
Sulfates	N/A	Attainment
Hydrogen Sulfide	N/A	Unclassified
Vinyl Chloride [c]	N/A	N/A

N/A = not applicable

[a] The NAAQS for 1-hour ozone was revoked on June 15, 2005, for all areas except Early Action Compact areas.

[b] Partial Non-attainment designation – Los Angeles County portion of the Air Basin only for near-source monitors.

[c] In 1990, the California Air Resources Board identified vinyl chloride as a toxic air contaminant and determined that it does not have an identifiable threshold. Therefore, the California Air Resources Board does not monitor or make status designations for this pollutant.

SOURCE: USEPA, Green Book Non-Attainment Areas for Criteria Pollutants, https://www.epa.gov/green-book, Green Book current as of January 31, 2020, accessed February 25, 2020; CARB, Area Designations Maps/State and National, http://www.arb.ca.gov/desig/adm/adm.htm, last reviewed October 24, 2019, accessed February 25, 2020.

(b) Toxic Air Contaminants

In addition to criteria pollutants, the SCAQMD periodically assesses levels of TACs in the Air Basin. The greatest potential for TAC emissions during construction is related to DPM emissions associated with heavy-duty equipment. During long-term operations, sources of DPM may include heavy duty diesel-fueled delivery trucks and stationary emergency generators.

Between July 2012 and June 2013, the SCAQMD conducted the Multiple Air Toxics Exposure Study (MATES IV), which is a follow-up to previous air toxics studies conducted in the Air Basin. The MATES IV Final Report was issued in May 2015. The study, based on actual monitored data throughout the Air Basin, consisted of several elements. These included a monitoring program, an updated emissions inventory of TACs, and a modeling

effort to characterize carcinogenic risk across the Air Basin from exposure to TACs. The study concluded that the average of the modeled air toxics concentrations measured at each of the monitoring stations in the Air Basin equates to a background cancer risk from long-term inhalation exposure to TAC emissions of approximately 418 in one million based on the average of 10 fixed monitoring sites and 367 in one million based on a population-weighted average risk. The overall cancer risk was about 65 percent lower for the average of 10 fixed monitoring sites and 57 percent lower for the population-weighted risk than the previous MATES III cancer risks.[81]

Subsequent to the SCAQMD's risk calculations estimates performed for MATES IV, the OEHHA updated its methods for estimating cancer risks, which utilizes higher estimates of cancer potency during early life exposures and uses different assumptions for breathing rates and length of residential exposures.[82] In March 2015, OEHHA adopted an updated guidance manual that incorporates advances in risk assessment with consideration of increased cancer potency for infants and children using Age Sensitivity Factors (ASF). The updated guidance manual also uses different assumptions for breathing rates and length of residential exposures. SCAQMD staff estimate that risks for the same long-term inhalation exposure level would be about 2.5 to 2.7 times higher using the updated methods, which would cause the average lifetime air toxics risk estimated from the monitoring sites data to change from 418 in one million to 1,023 in one million for the average of 10 fixed monitoring sites and from 367 in one million to 897 in one million for the population-weighted risk.[83] Under the updated OEHHA methodology, the relative reduction in the overall cancer risk from the MATES IV results compared to MATES III would be the same (about 65 percent and 57 percent reduction in risk, respectively).

Approximately 68 percent of the risk is attributed to DPM emissions, approximately 22 percent to other toxics associated with mobile sources (including benzene, butadiene, and formaldehyde), and approximately 10 percent of all airborne carcinogenic risk is attributed to stationary sources (which include industries and certain other businesses, such as dry cleaners and chrome plating operations).[84] The study also found lower ambient concentrations of most of the measured air toxics compared to the levels measured in the previous study conducted during 2004 and 2006. Specifically, benzene and 1,3-butadiene, pollutants generated mainly from vehicles, were down 35 percent and 11 percent, respectively.[85] The reductions were attributed to air quality control regulations and improved emission control technologies. In addition to air toxics, MATES IV included

81 SCAQMD, Final Report – Multiple Air Toxics Exposure Study in the South Coast Air Basin, 2015, p. ES-2 and ES-3.

82 California Environmental Protection Agency, Office of Health Hazard Assessment, Air Toxics Hot Spots Program, Guidance Manual for Preparation of Health Risk Assessments, 2015.

83 SCAQMD, Final Report – Multiple Air Toxics Exposure Study in the South Coast Air Basin, 2015, p. 2-11.

84 SCAQMD, Final Report – Multiple Air Toxics Exposure Study in the South Coast Air Basin, 2015, p. ES-2.

85 SCAQMD, Final Report – Multiple Air Toxics Exposure Study in the South Coast Air Basin, 2015, p. 6-1.

continuous measurements of black carbon and ultrafine particles (particles smaller than 0.1 microns in size), which are emitted by the combustion of diesel fuels. Sampling sites located near heavily-traveled freeways or near industrial areas were characterized by higher levels of black carbon and ultrafine particles compared to more rural sites.

(2) Local Area Conditions

(a) Existing Ambient Air Quality in the Surrounding Area

The SCAQMD maintains a network of air quality monitoring stations located throughout the Air Basin to measure ambient pollutant concentrations. The monitoring station most representative of the Project Site is the Central Los Angeles County Monitoring Station, located at 1630 North Main Street, Los Angeles, CA 90012. Criteria pollutants monitored at this station include ozone, NO_2, CO, SO_2, Pb, PM10, and PM2.5. The most recent data available from the SCAQMD for this monitoring station are from years 2016 to 2018.[86] The pollutant concentration data for these years are summarized in **Table IV.B-3,** *Ambient Air Quality in the Project Vicinity*. As shown in Table IV.B-3, the CAAQS and NAAQS were not exceeded in the Project Site vicinity for most pollutants between 2016 and 2018, except for O_3, PM10, and PM2.5.

TABLE IV.B-3
AMBIENT AIR QUALITY IN THE PROJECT VICINITY

Pollutant/Standard [a]	2016	2017	2018
Ozone, O_3 (1-hour)			
Maximum Concentration (ppm)	0.103	0.116	0.098
Days > CAAQS (0.09 ppm)	2	6	2
Ozone, O_3 (8-hour)			
Maximum Concentration (ppm)	0.078	0.086	0.073
4th High 8-hour Concentration (ppm)	0.071	0.080	0.071
Days > CAAQS (0.070 ppm)	4	14	4
Days > NAAQS (0.070 ppm)	4	14	4
Nitrogen Dioxide, NO_2 (1-hour)			
Maximum Concentration (ppm)	0.065	0.081	0.071
Days > CAAQS (0.18 ppm)	0	0	0
98th Percentile Concentration (ppm)	0.061	0.062	0.057
Days > NAAQS (0.100 ppm)	0	0	0
Nitrogen Dioxide, NO_2 (Annual)			
Annual Arithmetic Mean (0.030 ppm)	0.020	0.021	0.019

86 SCAQMD, Historical Data by Year 2016-2018, http://www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year, accessed February 25, 2020.

TABLE IV.B-3
AMBIENT AIR QUALITY IN THE PROJECT VICINITY

Pollutant/Standard [a]	2016	2017	2018
Carbon Monoxide, CO (1-hour)			
Maximum Concentration (ppm)	1.9	1.9	2.0
Days > CAAQS (20 ppm)	0	0	0
Days > NAAQS (35 ppm)	0	0	0
Carbon Monoxide, CO (8-hour)			
Maximum Concentration (ppm)	1.4	1.6	1.7
Days > CAAQS (9.0 ppm)	0	0	0
Days > NAAQS (9 ppm)	0	0	0
Sulfur Dioxide, SO_2 (1-hour)			
Maximum Concentration (ppm)	0.013	0.006	0.018
Days > CAAQS (0.25 ppm)	0	0	0
99th Percentile Concentration (ppm)	0.003	0.003	0.003
Days > NAAQS (0.075 ppm)	0	0	0
Sulfur Dioxide, SO_2 (24-hour)			
Maximum Concentration (ppm)	0.001	0.001	0.001
Days > CAAQS (0.04 ppm)	0	0	0
Respirable Particulate Matter, PM10 (24-hour)			
Maximum Concentration (µg/m^3)	67	96	81
Samples > CAAQS (50 µg/m^3)	18	41	31
Samples > NAAQS (150 µg/m^3)	0	0	0
Respirable Particulate Matter, PM10 (Annual)			
Annual Arithmetic Mean (20 µg/m^3)	32.4	34.4	34.1
Fine Particulate Matter, PM2.5 (24-hour)			
Maximum Concentration (µg/m^3)	44.4	49.2	43.8
98th Percentile Concentration (µg/m^3)	27.3	27.8	30.5
Samples > NAAQS (35 µg/m^3)	2	5	3
Fine Particulate Matter, PM2.5 (Annual)			
Annual Arithmetic Mean (12 µg/m^3)	11.8	11.9	12.6
Lead			
Maximum 30-day average (µg/m^3)	0.016	0.017	0.011
Samples > CAAQS (1.5 µg/m^3)	0	0	0
Maximum 3-month rolling average (µg/m^3)	0.01	0.01	0.01
Days > NAAQS (0.15 µg/m^3)	0	0	0

[a] ppm = parts per million; µg/m^3 = micrograms per cubic meter

SOURCE: SCAQMD, Historical Data by Year, http://www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year; CARB, Air Quality Data Statistics, http://www.arb.ca.gov/adam/; USEPA, AirData, http://www.epa.gov/airdata/ad_rep_mon.html, accessed January 2020.

(b) Existing Health Risk in the Surrounding Area

The SCAQMD has prepared a series of maps that show regional trends in estimated outdoor inhalation cancer risk from toxic emissions, as part of an ongoing effort to provide insight into relative risks. The maps represent the estimated number of potential cancers per million people associated with a lifetime of breathing air toxics (24 hours per day outdoors for 70 years). The background potential cancer risk per million people in the Project Site area using the updated OEHHA methodology is estimated at 1,150 in one million (compared to an overall Air Basin-wide risk of 1,023 in one million for the average of 10 fixed monitoring sites).[87] Generally, the risk from air toxics is lower near the coastline and increases inland, with higher risks concentrated near large diesel sources (e.g., freeways, airports, and ports).

(c) Existing Site Emissions

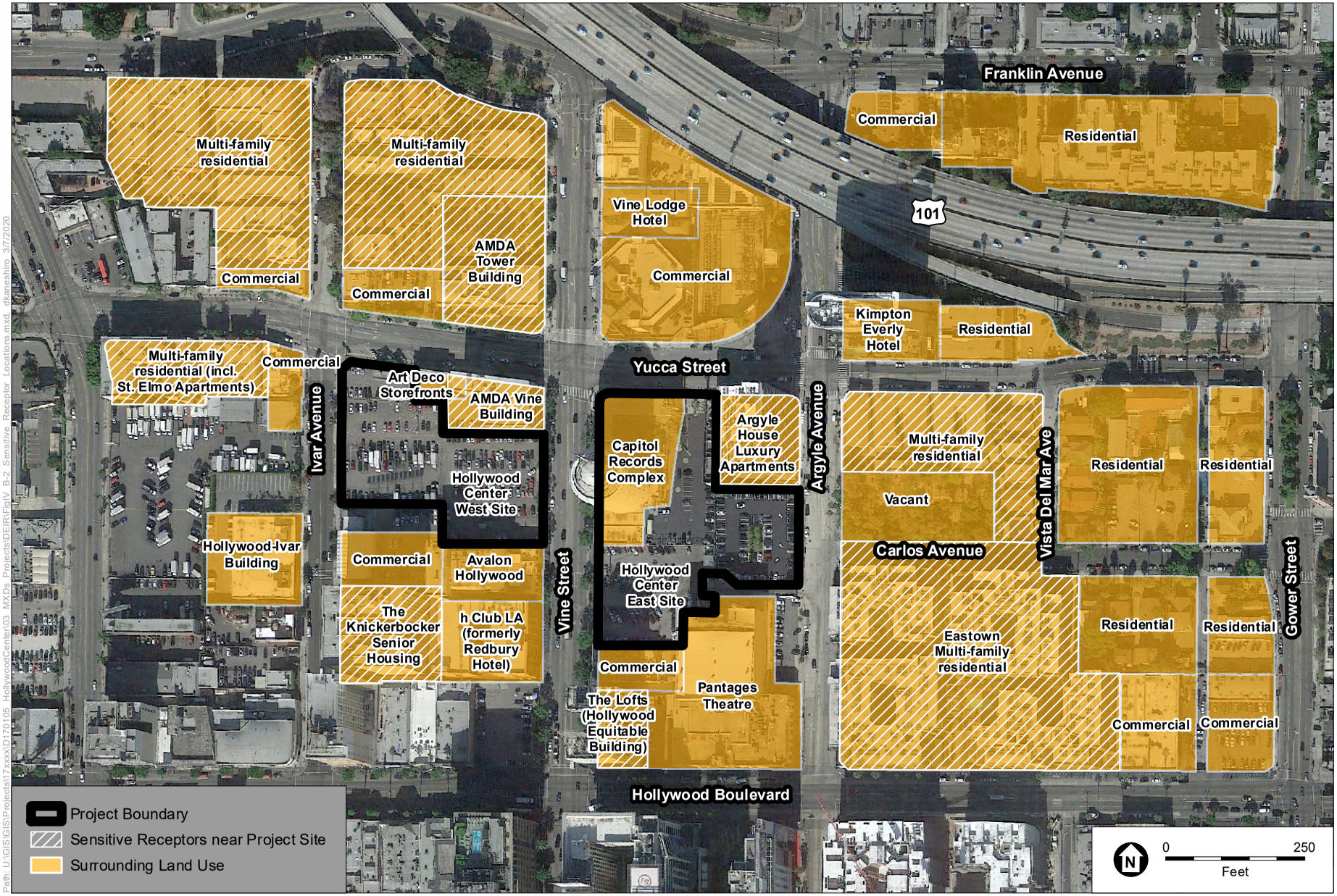
For the purposes of this analysis, no credit is taken for existing operational air quality emissions associated with the existing American Musical and Dramatic Academy (AMDA)-leased facility on the West Site, which is proposed for demolition, because the facility could relocate and continue to operate. In addition, since the Capitol Records Complex on the East Site would continue to operate as under existing conditions, this analysis assumes the portion of the existing East Site with the Capitol Records Complex would generate the same operational air quality emissions with or without the Project. Therefore, existing operational air quality emissions are not required to be calculated and the Project's air quality emissions are conservatively considered new.

(d) Sensitive Receptors and Locations

Certain population groups, such as children, elderly, and acutely and chronically ill persons (especially those with cardio-respiratory diseases), are considered more sensitive to the potential effects of air pollution than others. As a result, certain land uses that are occupied by these population groups, such as residences, hospitals, and schools, are considered to be air quality-sensitive land uses. The Project Site is surrounded by commercial, tourist and entertainment-related commercial uses, offices, hotels as well as air quality-sensitive land uses (i.e., multi-family residential, including senior housing) within approximately 500 feet of the West Site to the north, west, and south and the East Site to the east and south, as shown in **Figure IV.B-2,** *Sensitive Receptor Locations Nearest to the Project Site*. Air quality sensitive land uses nearest to the Project Site include the following:

1. Multi-family residential uses along Ivar Avenue and north of Yucca Street, approximately 170 feet from the West Site and 350 feet from the East Site construction area.

87 SCAQMD, Multiple Air Toxics Exposure Study, MATES IV Carcinogenic Risk Interactive Map.



SOURCE: Google Earth, 2017

Hollywood Center Project

Figure IV.B-2
Sensitive Receptor Locations Nearest to the Project Site

2. Argyle House (apartments) at the southwest corner of Yucca Street and Argyle Avenue, approximately 300 feet from the West Site and adjacent to the East Site construction area.

3. Multi-family residential uses to the east of Argyle Avenue, approximately 530 feet from the West Site and 80 feet from the East Site construction area.

4. American Music and Dramatic Academy (AMDA) Vine Building[88] immediately adjacent to the West Site and approximately 220 feet from the East Site construction area.

5. The AMDA Tower Building[89] is located on the northwest corner of Yucca Street and Vine Street and approximately 100 feet from the West Site and 400 feet from the East Site construction area.

6. Eastown multi-family residential uses to the east of Argyle Avenue, approximately 530 feet from the West Site and 80 feet from the East Site construction area.

7. The Lofts (Hollywood Equitable Building) at Hollywood Boulevard and Vine Street, which includes multi-family residential uses to the east of Vine Street, approximately 280 feet southeast of the West Site and 100 feet south of the East Site construction area.

8. The Knickerbocker Senior Residential use to the east of Ivar Avenue, approximately 90 feet south of the West Site and 300 feet west of the East Site construction area.

9. Multi-family residential uses to the west of Ivar Avenue, approximately 140 feet west of the West Site and 650 feet west of the East Site construction area.

10. All other air quality-sensitive uses are located at greater distances from the Project Site and would experience lower air pollutant impacts from potential sources of pollutants from the Project Site due to atmospheric dispersion effects.

88 While AMDA is not a pre-school, elementary, middle, or high school, the AMDA admissions policy indicates they accept applications from juniors and seniors in high school. Given the location of the AMDA Vine Building in proximity to the West Site and East Site, the AMDA Vine Building is included as a sensitive receptor for the purposes of the air quality analysis for this Project.

89 While AMDA is not a pre-school, elementary, middle, or high school, the AMDA admissions policy indicates they accept applications from juniors and seniors in high school. Given the location of the AMDA Tower Building in proximity to the Project West Site and East Site, the AMDA Tower Building is included as a sensitive receptor for the purposes of the air quality analysis for this Project.

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to air quality if it would:

Threshold (a): Conflict with or obstruct implementation of the applicable air quality plan;

Threshold (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;

Threshold (c): Expose sensitive receptors to substantial pollutant concentrations; or

Threshold (d): Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions. The factors to evaluate air quality impacts are listed below.

- Combustion Emissions from Construction Equipment
  - Type, number of pieces and usage for each type of construction equipment;
  - Estimated fuel usage and type of fuel (diesel, natural gas) for each type of equipment; and
  - Emission factors for each type of equipment.
- Fugitive Dust: Grading, Excavation and Hauling
  - Amount of soil to be disturbed on-site or moved off-site;
  - Emission factors for disturbed soil;
  - Duration of grading, excavation and hauling activities;
  - Type and number of pieces of equipment to be used; and
  - Projected haul route.
- Fugitive Dust: Heavy-Duty Equipment Travel on Unpaved Roads
  - Length and type of road;
  - Type, number of pieces, weight and usage of equipment; and
  - Type of soil.

- Other Mobile Source Emissions
  - Number and average length of construction worker trips to project site, per day; and
  - Duration of construction activities.

While these factors are important inputs in determining the amounts and nature of air pollution emissions generated by a project during construction, construction air quality emissions are evaluated in consideration of the thresholds set forth by the SCAQMD. Pursuant to the CEQA Guidelines (Section 15064.7), a lead agency may consider using, when available, significance thresholds established by the applicable air quality management district or air pollution control district when making determinations of significance. For purposes of this analysis, the City has determined to assess the potential air quality impacts of the Project in accordance with the most recent thresholds adopted by the SCAQMD in connection with its CEQA Air Quality Handbook, Air Quality Analysis Guidance Handbook, and subsequent SCAQMD guidance, as discussed below, and this assessment satisfies the considerations raised in the 2006 L.A. CEQA Thresholds Guide.[90]

Consistency with Applicable Air Quality Plans. CEQA Guidelines Section 15125 requires an analysis of project consistency with applicable governmental plans and policies. In accordance with the SCAQMD's CEQA Air Quality Handbook, the following criteria were used to evaluate the Project's consistency with the SCAQMD's 2016 AQMP and the City's General Plan Air Quality Element:

- Criterion 1: Will the Project result in any of the following:
  - An increase in the frequency or severity of existing air quality violations; or
  - Cause or contribute to new air quality violations; or
  - Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- Criterion 2: Will the Project exceed the assumptions utilized in preparing the AQMP?

The Project's potential impacts with respect to these criteria are discussed to assess the consistency with the SCAQMD's 2016 AQMP and applicable City General Plan Air Quality Element plans and policies.

Construction and Operational Emission Air Quality Standards. A significant impact may occur if a project would add a cumulatively considerable contribution of a federal or state non-attainment pollutant. The Air Basin is currently in non-attainment for ozone, PM10, and PM2.5. SCAQMD methodology recommends that significance thresholds be

90 While the SCAQMD CEQA Air Quality Handbook contains significance thresholds for lead, Project construction and operation would not include sources of lead emissions and would not exceed the significance thresholds for lead. Unleaded fuel and unleaded paints have virtually eliminated lead emissions from commercial land use projects such as the Project. As a result, lead emissions are not further evaluated in this Draft EIR.

used to determine the potential cumulative impacts to regional air quality along with a project's consistency with the current AQMP.

The SCAQMD has established numerical significance thresholds for construction and operational activities. The numerical thresholds are based on the recognition that the Air Basin is a distinct geographic area with a critical air pollution problem for which ambient air quality standards have been promulgated to protect public health.[91] Given that construction impacts are temporary and limited to the construction phase, the SCAQMD has established numerical significance thresholds specific to construction activity. Based on the thresholds in the SCAQMD CEQA Air Quality Handbook,[92] the Project would potentially result in a significant impact of a federal or State non-attainment pollutant if emissions of ozone precursors (VOC and NO_X), PM10, or PM2.5 would exceed the values shown in **Table IV.B-4**, *SCAQMD Regional Emissions Thresholds*.

TABLE IV.B-4
SCAQMD REGIONAL EMISSIONS THRESHOLDS (POUNDS PER DAY)

Activity	VOC	NO_X	CO	SO_2	PM10	PM2.5
Construction	75	100	550	150	150	55
Operations	55	55	550	150	150	55

SOURCE: SCAQMD, Air Quality Significance Thresholds, April 2019.

Localized Emission Impacts on Sensitive Receptors. In addition, the SCAQMD has developed a methodology to assess the potential for localized emissions to cause an exceedance of applicable ambient air quality standards or ambient concentration limits. Impacts would be considered significant if the following would occur:

- Maximum daily localized emissions of NO_X and/or CO during construction or operation are greater than the applicable localized significance thresholds, resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for NO_2 and/or CO.[93]
- Maximum daily localized emissions of PM10 and/or PM2.5 during construction are greater than the applicable localized significance thresholds, resulting in predicted ambient concentrations in the vicinity of the Project Site to exceed 10.4 $\mu g/m^3$ over 24 hours (SCAQMD Rule 403 control requirement).
- Maximum daily localized emissions of PM10 and/or PM2.5 during operation are greater than the applicable localized significance thresholds, resulting in predicted ambient concentrations in the vicinity of the Project Site to exceed 2.5 $\mu g/m^3$ over 24 hours (SCAQMD Rule 1303 allowable change in concentration).

91 SCAQMD, CEQA Air Quality Handbook, April 1993.
92 SCAQMD, Air Quality Significance Thresholds, April 2019.
93 SCAQMD, Final Localized Significance Threshold Methodology, June 2003 and revised July 2008.

- The following conditions would occur at an intersection or roadway within one-quarter mile of a sensitive receptor:
  - The Project would cause or contribute to an exceedance of the CAAQS 1-hour or 8-hour CO standards of 20 or 9.0 parts per million (ppm), respectively.
  - Where the CO standard is exceeded at the intersection, a project would result in a significant impact if the incremental increase due to the project is equal to or greater than 1.0 ppm for the California 1-hour CO standard, or 0.45 ppm for the 8-hour CO standard.

The SCAQMD has established screening criteria that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds and, therefore, not cause or contribute to an exceedance of the applicable ambient air quality standards or ambient concentration limits without project-specific dispersion modeling.[94] This analysis uses the screening criteria to evaluate impacts from localized emissions where applicable.

Toxic Air Contaminants and Sensitive Receptors. Based on the SCAQMD thresholds, the Project would cause a significant impact by exposing sensitive receptors to toxic air contaminants if any of the following would occur:[95]

- The Project emits carcinogenic materials or TACs that exceed the maximum incremental cancer risk of ten in one million or a cancer burden greater than 0.5 excess cancer cases (in areas greater than or equal to 1 in 1 million) or an acute or chronic hazard index of 1.0.

Objectionable Odors and Other Emissions. With respect to other emissions, such as odors, the Project would be considered significant if it created objectionable odors affecting a substantial number of people. In addition, based on the thresholds in the SCAQMD CEQA Air Quality Handbook,[96] the Project would potentially result in a significant impact of an attainment, maintenance, or unclassified pollutant if emissions of CO or SO_2 would exceed the values shown in Table IV.B-4.

b) Methodology

The evaluation of potential impacts to regional and local air quality that may result from the construction and long-term operations of the Project is discussed below. Additional details are provided in the AQ/GHG Technical Appendix, included as Appendix E of this Draft EIR.

94 SCAQMD, Final Localized Significance Threshold Methodology, June 2003 and revised July 2008.
95 SCAQMD, CEQA Air Quality Handbook, April 1993.
96 SCAQMD, Air Quality Significance Thresholds, April 2019.

(1) SCAQMD Air Quality Guidance Documents

The SCAQMD published the CEQA Air Quality Handbook to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts.[97] The CEQA Air Quality Handbook provides standards, methodologies, and procedures for conducting air quality analyses in EIRs and was used extensively in the preparation of this analysis. However, the SCAQMD is currently in the process of replacing the CEQA Air Quality Handbook with the Air Quality Analysis Guidance Handbook. While this process is underway, the SCAQMD recommends that lead agencies avoid using the screening tables in Chapter 6 (Determining the Air Quality Significance of a Project) and the on-road mobile source emission factors in Tables A9-5-J1 through A9-5 of the Handbook as they are outdated.

The SCAQMD instead recommends using other approved models to calculate emissions from land use projects, such as the California Emissions Estimator Model (CalEEMod) software, which is a model developed for the California Air Pollution Control Officers Association (CAPCOA) in collaboration with the California Air Districts. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions from a variety of land use projects.

The SCAQMD has also adopted land use planning guidelines in its Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, which considers impacts to sensitive receptors from facilities that emit TAC emissions.[98] SCAQMD's general land use siting distance recommendations are the same as those provided by CARB (e.g., a 500-foot siting distance for sensitive land uses proposed in proximity to freeways and high-traffic roads, a 1,000-foot siting distance for sensitive land uses proposed in proximity to a major service and maintenance rail yard, and the same siting criteria for distribution centers and dry cleaning facilities). The SCAQMD's document introduces land use-related policies that rely on design and distance parameters to minimize emissions and lower potential health risk. SCAQMD's guidelines are voluntary initiatives recommended for consideration by local planning agencies. Since the Project Site is within 1,000 feet of the Hollywood Freeway (US-101), which, at its closest point, is located approximately 380 feet north of the East Site's northernmost boundary, TAC emissions from the freeway will be considered in this analysis and is provided in Section IV.H, Land Use and Planning, of this Draft EIR.

The SCAQMD has published a guidance document called the Final Localized Significance Threshold Methodology for CEQA Evaluations that is intended to provide

97 SCAQMD, CEQA Air Quality Handbook, April 1993.

98 SCAQMD, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 2005.

guidance when evaluating the localized effects from mass emissions during construction.[99] The SCAQMD adopted additional guidance regarding PM2.5 emissions in a document called Final Methodology to Calculate Particulate Matter (PM)2.5 and PM2.5 Significance Thresholds.[100] This latter document has been incorporated by the SCAQMD into its CEQA significance thresholds and Final Localized Significance Threshold Methodology.

(2) Consistency with Air Quality Management Plan

The SCAQMD is required, pursuant to the CAA, to reduce emissions of criteria pollutants for which the Air Basin is in non-attainment of the NAAQS (e.g., ozone and PM2.5).[101] The SCAQMD's 2016 AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving five NAAQS related to these pollutants, including transportation control strategies from SCAG's 2016-2040 RTP/SCS designed to reduce VMT.[102] The 2016 AQMP control strategies were developed, in part, based on regional growth projections prepared by SCAG through 2040.[103] For this reason, projects whose growth is consistent with the assumptions used in the 2016-2040 RTP/SCS will be deemed to be consistent with the 2016 AQMP because their growth has already been included in the growth projections utilized in the formulation of the control strategies in the 2016 AQMP. Thus, emissions from projects, uses, and activities that are consistent with the applicable growth projections and control strategies used in the development of the 2016 AQMP would not jeopardize attainment of the air pollutant reduction goals identified in the AQMP even if their emissions exceed the SCAQMD's thresholds of significance.[104] As noted above, the 2016 AQMP has been adopted by the SCAQMD and CARB. Therefore, this analysis considers the consistency of the Project (see Chapter II, *Project Description*, of this Draft EIR for additional details) with the 2016 AQMP based on the AQMP's consistency with applicable growth projections and emission control strategies.

(3) Consistency with General Plan – Air Quality Element

As discussed previously, the City's General Plan Air Quality Element includes Citywide goals, objectives, and policies that guide the City in the implementation of its air quality improvement programs and strategies. Goals, objectives, and policies of the Air Quality Element relevant to the Project include minimizing traffic congestion and increasing energy efficiency, as well as reducing air pollutant emissions consistent with the AQMP. The analysis below provides a side-by-side comparison of each of the relevant provisions

99 SCAQMD, Final Localized Significance Threshold Methodology, June 2003 and revised July 2008.

100 SCAQMD, Final Methodology to Calculate Particulate Matter (PM)2.5 and PM2.5 Significance Thresholds, 2006.

101 The Los Angeles County portion of the Air Basin is designated as nonattainment for the federal lead standard; however, this was due to localized emissions from two lead-acid battery recycling facilities in the City of Vernon and the City of Industry that are no longer operating. For reference see SCAQMD, Board Meeting, Agenda No. 30, Adopt the 2012 Lead State Implementation Plan for Los Angeles County, May 4, 2012.

102 SCAQMD, 2016 AQMP, March 2017, pp. ES-6 and 4-42.

103 SCAQMD, 2016 AQMP, March 2017, pp. 4-42 to 4-44.

104 SCAQMD, CEQA Air Quality Handbook, April 1993, p. 12-1.

in the Air Quality Element with the Project to determine whether the Project would be consistent with those provisions.

(4) Existing Project Site Emissions

As previously described, for the purposes of this analysis, no existing operational AQ emissions are assumed from the existing AMDA-leased facility on the West Site, which is proposed for demolition because the facility could relocate to another location and continue to operate. In addition, since the Capitol Records Complex on the East Site would continue to operate as under existing conditions, this analysis assumes the portion of the existing East Site with the Capitol Records Complex would generate the same operational AQ emissions with the Project or the Project with the East Site Hotel Option. Therefore, existing operational AQ emissions are not required to be calculated and the Project's AQ emissions are conservatively considered new.

(5) Construction Impacts

Construction air quality impacts were assessed based on the incremental increase in emissions compared to baseline conditions. Under CEQA, the baseline environmental setting for an EIR is generally established at or around the time that the Notice of Preparation (NOP) for the EIR is published.

Project construction activities that would have the potential to create regional air quality impacts include vehicle trips generated by construction workers, vendor trucks, and haul trucks traveling to and from the Project Site and building activities, such as the application of paint and other surface coatings. The Project's daily regional criteria pollutant emissions during construction have been estimated by assuming a conservative scenario for construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile source and fugitive dust emissions factors. The emissions have been estimated using the CalEEMod software, an emissions inventory software program recommended by the SCAQMD and the CARB on-road vehicle emissions factor model (EMFAC). Construction phasing would include Demolition, Utilities/Trenching, Site Preparation, Grading/Excavation, Foundations/Concrete Pour, Building Construction, Paving, and Architectural Coatings. This Draft EIR considered two potential construction scenarios in order to conservatively estimate the maximum construction emissions:

- Overlapping Construction Scenario: A construction scenario where construction of the West and East Sites have some overlap (overlapping scenario, with shorter overall construction duration). Under the overlapping construction scenario, the Utilities/Trenching, Site Preparation, and early Grading/Excavation phases could begin on the East Site while the West Site is in the Building Construction phase. In this overlapping construction scenario, construction could be completed in approximately 4.5 years (beginning in 2021 and completion in 2025).

- Sequential Construction Scenario: Under the sequential construction scenario, construction of the West and East Sites are entirely separate and sequential where

there would be no overlap (sequential construction scenario, extended construction duration). In this scenario, construction would be completed over an approximately seven-year period (beginning in 2021 and completion in 2027).

Of the two construction scenarios described above, the overlapping construction scenario would generate the maximum daily emissions because it would result in more intense daily construction activity. Therefore, for modeling purposes, construction emissions were modeled for construction of the West Site and East Site under the overlapping construction scenario beginning in 2021 and full Project buildout in 2025.

The input values used in this analysis were adjusted to be Project-specific based on equipment types and the construction schedule based on information provided by the by the Project's construction representative. Emissions from off-road equipment and off-road vehicles were estimated through CalEEMod, since CalEEMod is based on outputs from the CARB off-road emissions factor (OFFROAD) which is the emissions estimation model developed by CARB and used to calculate emissions from construction activities, including off-road vehicles. Worker trip estimates were provided by the Project's construction representative, and vendor truck trip estimates were based on calculation methodologies in CalEEMod. However, the actual emissions from worker trips and vendor truck trips were estimated outside of CalEEMod to account for the CARB 2017 on-road vehicle emissions factor (EMFAC2017) model because EMFAC2017 has not yet been incorporated in the current version of CalEEMod.

Haul truck trip estimates were based on excavation volumes obtained from the Project's engineering consultant, KPFF Consulting Engineers, and 14 cubic yard soil capacity haul trucks; cement truck trip estimates were based on mat foundation volumes obtained from the Project's construction representative and 9 cubic yard concrete capacity concrete trucks. Emissions from haul trucks and concrete trucks were also estimated outside of CalEEMod using EMFAC2017 emission factors for haul and concrete trucks because CalEEMod assumes that the number of heavy-duty trucks input into the model occurs across the entire length of the applicable construction phases. However, since the applicable construction phases would not have hauling activities and haul trucks on-site every day within each particular phase, the emissions calculations performed outside of CalEEMod are able to account for the varying maximum numbers of daily haul truck and concrete truck trips within each of the demolition, grading/excavation, foundations/concrete pour, and building construction phases. These values were applied to the construction phasing assumptions used in the criteria pollutant analysis to generate criteria pollutant emissions values for each construction activity. The Project would export approximately 542,300 cubic yards of soil and approximately 1,616 cubic yards of demolition debris.

Emissions from Project construction activities were estimated based on the construction phase in which the activity would be occurring. The maximum daily emissions were predicted values for the worst-case day and do not represent the emissions that would occur daily during Project construction. The maximum daily emissions were compared to

the SCAQMD daily regional thresholds of significance. A detailed discussion of the Project's construction phasing and equipment list is available in the AQ/GHG Technical Appendix for the Project, which is provided in Appendix E of this Draft EIR.[105]

Project construction activities that would have the potential to create local air quality impacts include fugitive dust from grading and demolition and building activities such as the application of paint and other surface coatings. The localized effects from the on-site portion of the Project's construction emissions were evaluated at the nearby sensitive receptor locations that would be potentially impacted by Project construction in accordance with the SCAQMD's Final Localized Significance Threshold Methodology.[106] The localized significance thresholds only address NO_X, CO, PM10, and PM2.5 emissions. The SCAQMD has established screening criteria that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds and therefore not cause or contribute to an exceedance of the applicable ambient air quality standards without the need for Project-specific dispersion modeling. The localized analysis for the Project is based on this SCAQMD screening criteria. The Project Site is located in the SCAQMD's Central Los Angeles Source Receptor Area 1 and is approximately 4.61[107,108] acres in size (post dedication), with the West Site taking place on approximately 1.92 acres of the Project Site and the East Site on approximately 2.69 acres of the Project Site. In order to provide a conservative assessment of localized construction and operational emissions, the screening criteria used in the analysis were those applicable to a 4.61-acre site, in the Central Los Angeles area with sensitive receptors located 25 meters away.[109] The maximum daily emissions from construction of the Project were compared to these screening criteria.

Project construction is estimated to start in 2021, but may commence at a later date. If this occurs, construction impacts would be lower than those analyzed below due to the use of a more energy-efficient and cleaner burning construction vehicle fleet mix, pursuant to State regulations that require vehicle fleet operators to phase-in less polluting heavy-duty equipment (see Subsection IV.B.2.b)(2)(c), *On-Road and Off-Road Vehicle Rules*, for additional details). As a result, should Project construction commence at a later date than analyzed in this Draft EIR, air quality impacts would be lower than the impacts disclosed herein.

105 Impacts from asbestos and lead-based paint from Project demolition are expected to be less than significant and less than significant after implementation of mitigation measures, respectively. For additional details please refer to Section IV.F, *Hazards and Hazardous Materials,* of this Draft EIR.

106 SCAQMD, Final Localized Significance Threshold Methodology, June 2003 and revised July 2008.

107 SCAQMD, General Forecast Areas & Air Monitoring Areas, 1999.

108 This includes the post-dedication square footage that is calculated with the inclusion of the 1,267-square-foot East Site Alley Merger and the 5,163-square-foot sidewalk merger (along Yucca Street and both sides of Vine Street) area.

109 SCAQMD, Final Localized Significance Threshold Methodology, June 2003 and revised July 2008, p. 3-3. "Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters."

(6) Operational Impacts

The two construction scenarios (i.e., the overlapping construction scenario and the sequential construction scenario) result in two potential operational buildout timeframes for the Project since construction would be completed earlier for the overlapping construction scenario. Since mobile source emissions decrease in future years, the operational emissions analysis was prepared for the earlier operational buildout timeframe (i.e., the overlapping construction scenario) for the Project, which would result in the maximum operational emissions. In addition, under both construction scenarios, the West Site would be completed first in year 2024 and operational before completion of the East Site. Therefore, operational emissions for the West Site in year 2024 were also analyzed and presented below.

The Project's operational emissions were estimated using the CalEEMod software. CalEEMod was used to forecast the daily regional criteria pollutant emissions from on-site area and stationary sources that would occur during long-term Project operations. For mobile sources, the estimated vehicle trips and VMT were provided for the Project uses in the Transportation Assessment for the Hollywood Center Project[110] and are provided in Appendix N-1 of this Draft EIR. The EMFAC model was run in the emissions mode (also referred to as the "Burden" mode) and used to generate Los Angeles County-specific vehicle fleet emission factors in units of grams or metric tons per mile. These emission factors were then applied to the daily VMT to obtain daily mobile source emissions. Since all vehicle types would visit the Project Site, this assessment uses Los Angeles County's motor vehicle fleet mix and the fleet average calendar year emissions factors from EMFAC to estimate mobile source emissions. Mobile source emissions are estimated for calendar years 2024 and 2025 corresponding to when the West Site buildout and full Project buildout are anticipated under the overlapping construction scenario. Operational impacts would be lower in year 2027 than year 2025 due to the improving vehicle technology that would be more fuel-efficient and lead to a cleaner vehicle fleet mix traveling to and from the Project Site as reflected in EMFAC mobile source emission factors. Therefore, to present the most conservative analysis, only operational emissions from Project buildout in year 2025 are shown below, as operational emissions for year 2027 would be lower than those presented for 2025 due to overall improved vehicle fleet emissions standards.

Operation of the Project has the potential to generate criteria pollutant emissions through vehicle and truck trips traveling to and from the Project Site. In addition, emissions would result from area sources located on-site, such as natural gas combustion from water heaters, boilers, and cooking stoves, landscaping equipment, and use of consumer products. The Project is not expected to contain any large stationary combustion equipment, such as large boilers or combustion turbines. Building natural gas usage factors in CalEEMod are based on the California Energy Commission 2002 California

110 Fehr & Peers, Transportation Assessment for the Hollywood Center Project, March 2020. Provided in Appendix N-1 of this Draft EIR.

Commercial End-Use Survey data adjusted to reflect more recent Title 24 Energy Efficiency Standards for Residential and Nonresidential Buildings.

Stationary-source emissions are estimated separately outside of the CalEEMod software as certain stationary sources, such as restaurant charbroilers, are not accounted for in CalEEMod. Stationary sources may include charbroiling of meat that may occur on-site during food preparation activities in the restaurant kitchen. Charbroiling emissions are calculated based on emissions factors available from the SCAQMD. In order to provide a conservative analysis, it was assumed that the restaurant uses would charbroil meat with relatively high emission factors (i.e., hamburger meat and chicken). The quantity of meat charbroiled in the restaurant uses are based on survey data from the SCAQMD and San Joaquin Valley Air Pollution Control District. The estimated emissions account for reductions from compliance with emissions control requirements consistent with SCAQMD Rule 1138.

Stationary sources would also include emergency generators in each residential tower on the West Site and East Site with an estimated capacity rated at approximately 1,500 kilowatts (2,012 horsepower) for each site, which would provide emergency power primarily for lighting and other emergency building systems. The emergency generators would result in emissions during maintenance and testing operations. Emergency generators are permitted by the SCAQMD and regulated under SCAQMD Rule 1470. Maintenance and testing would not occur daily, but rather periodically, up to 50 hours per year per Rule 1470. For the purposes of estimating maximum daily emissions, it is estimated that the emergency generators would operate for up to two hours in a day for maintenance and testing purposes.

Stationary sources would also include on-site cooling towers to assist in dissipating heat from commercial processes, such as commercial heating, ventilation and air conditioning (HVAC) systems, of the Project. The Project's cooling towers would result in emissions due to the required energy to supply, distribute, and treat the water used, and emissions were estimated separately outside of the CalEEMod software.

(7) Localized Emissions

The localized effects from the on-site portion of the maximum daily emissions from Project operation were evaluated at the nearby sensitive receptor locations that would be potentially impacted by operation of the Project according to the SCAQMD's Final Localized Significance Threshold Methodology.[111] The localized impacts from operation of the Project were assessed similar to the construction emissions, as discussed previously. For further explanation, please see Appendix E of this Draft EIR.

111 SCAQMD, Final Localized Significance Threshold Methodology, June 2003 and revised July 2008.

(8) CO Hotspots

The greatest quantities of CO are produced from motor vehicle combustion and are usually concentrated at or near ground level because they do not readily disperse into the atmosphere, particularly under cool, stable (i.e., low or no wind) atmospheric conditions. Localized areas where ambient concentrations exceed State and/or federal standards are termed "CO hotspots." The potential for the Project to cause or contribute to the formation of off-site CO hotspots was evaluated based on prior dispersion modeling of the four busiest intersections in the Air Basin that the SCAQMD conducted for its CO Attainment Demonstration Plan in the AQMP. The analysis compares the intersections with the greatest peak-hour traffic volumes that would be impacted by the Project to the intersections modeled by the SCAQMD. Project-impacted intersections with peak-hour traffic volumes that would be lower than the intersections modeled by the SCAQMD, in conjunction with lower background CO levels, would result in lower overall CO concentrations as compared to the SCAQMD-modeled values to maintain attainment status in its AQMP.

(9) Toxic Air Contaminant Impacts (Construction and Operations)

The greatest potential for TAC emissions during construction would be related to DPM emissions associated with heavy-duty equipment during excavation and grading activities. Construction activities associated with the Project would be sporadic, transitory, and short-term in nature (approximately 4.5 years under the overlapping construction scenario and approximately 7 years under the sequential scenario). As further described below, the City is not required to conduct a quantified health risk assessment (HRA) for mixed-use residential and commercial projects, such as the Project, as the applicable standards and guidance that are available are intended for evaluation of health risks associated with stationary long-term sources of TAC emissions. Rather than being a stationary source of TAC emissions, the Project's emissions are largely from mobile sources, and, while the Project would generate localized TAC emissions during construction, the associated activities and exposures would be short- rather than long-term.

The OEHHA developed the Air Toxics Hot Spots Program Guidance Manual for the Preparation of Risk Assessments (Guidance Manual),[112] in conjunction with CARB, for use in implementing the Air Toxics "Hot Spots" Program (Health and Safety Code Section 44360 et. seq.). The Air Toxics "Hot Spots" Program requires stationary sources to report the types and quantities of certain substances routinely released into the air. The goals of the Air Toxics "Hot Spots" Act are to collect emission data, to identify facilities having localized impacts, to ascertain health risks, to notify nearby residents of significant risks, and to reduce those significant risks to acceptable levels. The intent in developing the

112 Office of Environmental Health Hazard Assessment, Air Toxics Hot Spots Program, Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments, February 2015.

Guidance Manual was to provide HRA procedures for use in the Air Toxics Hot Spots Program or for the permitting of new or modified stationary sources.

Although the HRA guidelines are intended for assessment of long-term stationary sources, in relation to assessment of health risk due to short-term construction, the Guidance Manual states:

> *"The local air pollution control districts sometimes use the risk assessment guidelines for the Hot Spots program in permitting decisions for short-term projects such as construction or waste site remediation. Frequently, the issue of how to address cancer risks from short-term projects arises. Cancer potency factors are based on animal lifetime studies or worker studies where there is long-term exposure to the carcinogenic agent. There is considerable uncertainty in trying to evaluate the cancer risk from projects that will only last a small fraction of a lifetime."*[113]

The Project is not a "Hot Spots" Program project but rather involves the construction and operation of a mixed-use development that would include residential and restaurant/retail uses as well as hotel uses under the Project with the East Site Hotel Option. The OEHHA Guidance Manual applies to stationary source operations which have no applicability to mixed-use residential and commercial projects, such as the Project. While OEHHA provides limited guidance on how to conduct HRAs for short-term projects, it makes it clear there is "considerable uncertainty" in evaluating cancer risk over short-term durations. In addition, the Guidance Manual does not identify short-term projects or non-stationary source projects that warrant the preparation of a HRA, nor does it recommend the preparation of HRAs for short-term construction projects or non-stationary source projects, like the Project.

In addition to OEHHA highlighting the considerable uncertainty in meaningfully evaluating short term exposures to TACs, with respect to construction emissions, the SCAQMD states that "SCAQMD currently does not have guidance on construction Health Risk Assessments."[114] Furthermore, in comments presented to the SCAQMD Governing Board (Meeting Date: June 5, 2015, Agenda No. 28) relating to TAC exposures associated with Rules 1401, 1401.1, 1402 and 212 revisions, with regard to the use of the OEHHA Guidance Manual for projects subject to CEQA, SCAQMD staff reported that:

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113 Office of Environmental Health Hazard Assessment, Air Toxics Hot Spots Program, Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments, page 8-17, February 2015.

114 South Coast Air Quality Management District, Final Environmental Assessment for: Proposed Amended Rule 307.1 – Alternative Fees for Air Toxics Emissions Inventory; Proposed Amended Rule 1401 – New Source Review of Toxic Air Contaminants; Proposed Amended Rule 1402 – Control of Toxic Air Contaminants from Existing Sources; SCAQMD Public Notification Procedures for Facilities Under the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588) and Rule 1402; and, SCAQMD Guidelines for Participating in the Rule 1402 Voluntary Risk, page 2-23, September 2016. The SCAQMD only applies the revised OEHHA Guidelines for operational impacts at stationary industrial source facilities that are in the AB 2588 Air Toxics Hot Spots program, which does not apply to the Project.

> *The Proposed Amended Rules are separate from the CEQA significance thresholds. Per the Response to Comments Staff Report PAR 1401, 1401.1, 1402, and 212 A—(8 June 2015), SCAQMD staff is currently evaluating how to implement the Revised OEHHA Guidelines under CEQA. The SCAQMD staff will evaluate a variety of options on how to evaluate health risks under the Revised OEHHA Guidelines under CEQA. The SCAQMD staff will conduct public workshops to gather input before bringing recommendations to the Governing Board.*

To date, the SCAQMD has not conducted public workshops nor developed policy relating to the applicability of applying the Guidance Manual for projects prepared by other public/lead agencies subject to CEQA, for short-term construction emissions, or for mixed-use residential and commercial projects, such as the Project. Therefore, in light of the considerable uncertainty and lack of accepted guidance for assessing short-term construction emissions from OEHHA and SCAQMD, the City does not require that a quantified HRA be prepared for the Project for purposes of CEQA compliance. However, for informational purposes only, and in the spirit of the Project proving environmental leadership through the ELDP program, a refined quantitative construction HRA has been prepared and is included in Appendix E of this Draft EIR. The results of the construction HRA, which was performed through a refined modeling approach using the USEPA/AMS Regulatory Model (AERMOD), apply to both the Project and the Project with the East Site Hotel Option.

During long-term operations, TACs could be emitted as part of periodic maintenance operations, periodic testing and maintenance of the emergency generator, restaurant charbroiling, from routine cleaning, from periodic painting, etc., and from periodic visits from delivery trucks and service vehicles. However, these events are expected to be occasional and result in minimal emissions exposure to off-site sensitive receptors. As the Project consists of residential and commercial/restaurant uses, the Project would not include sources of substantial TAC emissions identified by the SCAQMD or CARB siting recommendations.[115,116] Thus, a qualitative analysis is appropriate for assessing the Project's operational emissions. The siting of the Project itself in relation to off-site sources of TACs is addressed under land use compatibility for the surrounding area in Section IV.H, *Land Use and Planning*, of this Draft EIR.

c) Project Design Features

Refer to Project Design Feature GHG-PDF-1 (Green Building Features) in Section IV.E, *Greenhouse Gas Emissions,* of this Draft EIR. With this Project Design Feature, the Project will be designed to achieve the equivalent of the United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Gold Certification level or equivalent for new buildings. This Project Design Feature, which

115 SCAQMD, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 2005, Table 2-3.

116 CARB, Air Quality and Land Use Handbook: A Community Health Perspective, April 2005, Table 1-1.

includes incorporation of heat island reduction strategies, electric vehicle (EV) charging stations, optimization of building energy performance, and water reduction strategies, will minimize building energy demand and associated air pollutant emissions.

d) Analysis of Project Impacts

Threshold (a): Would the Project conflict with or obstruct the implementation of the applicable air quality plan?

Although the East Senior Building under the Project with the East Site Hotel Option would be two floors shorter than under the Project, construction would require the same construction equipment as the Project. Construction duration for the Project with the East Site Hotel Option would slightly decrease due to construction of a shorter building. However, the amount of maximum daily construction equipment and emissions, which is in large part the basis for the analysis, would be the same for the Project and the Project with the East Site Hotel Option. During operation, the Project and the Project with the East Site Hotel Option would result in nominally different daily emissions. However, the Project's consistency with applicable air quality plans would be essentially same as the Project with the East Site Hotel Option. Thus, the conclusions regarding the impact analysis, impact significance, and mitigation measures presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

(1) Impact Analysis

The following analysis addresses the Project's consistency with applicable SCAQMD and SCAG policies, inclusive of regulatory compliance. In accordance with SCAQMD's CEQA Air Quality Handbook, the following criteria are required to be addressed to determine the Project's consistency with applicable SCAQMD and SCAG policies:

(a) Criterion 1

With respect to the first criterion, as discussed under the analysis for Threshold (c) below, localized concentrations of NO_2 as NO_X, CO, PM10, and PM2.5 have been analyzed for the Project. SO_2 emissions would be negligible during construction and long-term operations and, therefore, would not have the potential to cause or effect a violation of the SO_2 ambient air quality standard. Since VOCs are not a criteria pollutant, there is no ambient standard or localized threshold for VOCs. However, due to the role VOCs play in O_3 formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.

The Project's NO_X, CO, PM10, and PM2.5 emissions during construction and operations were analyzed: (1) to ascertain potential effects on localized concentrations; and (2) to determine if there is a potential for such emissions to cause or effect a violation of the ambient air quality standards for NO_2, CO, PM10, and PM2.5. As shown in Table IV.B-14, the increases in localized emissions of NO_X, CO, PM10, and PM2.5 during construction would not exceed the SCAQMD-recommended localized significance

thresholds at sensitive receptors in proximity to the Project Site. As shown in Table IV.B-15 through IV.B-17, the increases in localized emissions of NO_X, CO, PM10, and PM2.5 emissions during operations would not exceed the SCAQMD-recommended localized significance thresholds at sensitive receptors in proximity to the Project Site.

Because the Project would not introduce any substantial stationary sources of emissions, CO is the appropriate benchmark pollutant for assessing local area air quality impacts from post-construction motor vehicle operations.[117] As indicated below in Threshold (c), no intersections would result in a CO hotspot in excess of the ambient air quality standards, and impacts would be less than significant. Therefore, the Project would not increase the frequency or severity of an existing CO violation or cause or contribute to new CO violations.

Therefore, in response to Criterion 1, the Project and the Project with the East Site Hotel Option would not increase the frequency or severity of an existing violation or cause or contribute to new violations for these pollutants. As the Project would not exceed any of the State and federal standards, the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP.

(b) Criterion 2

With respect to the second criterion for determining consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2016-2040 RTP/SCS regarding population, housing, and growth trends. Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of consistency with applicable population, housing, and employment growth projections and appropriate incorporation of AQMP control measures. The following discussion provides an analysis with respect to these criteria.

(i) Air Quality Management Plan Consistency

Construction and operation of the Project would comply with applicable required fleet rules and control strategies to reduce on-road truck emissions (i.e., 13 CCR, Section 2025 [CARB Truck and Bus regulation]), and other applicable SCAQMD rules specified and incorporated in the 2016 AQMP. As discussed under Subsection IV.B.3.(b), *Methodology*, projects, uses, and activities that are consistent with the applicable growth projections and control strategies used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP even if their emissions exceed the SCAQMD's thresholds of significance. As discussed below, compliance with the applicable required fleet rules and control strategies and requirements would render it consistent with, and meet or exceed, the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. Thus, the Project's construction-related and operations-related criteria pollutant emissions would

117 SCAQMD, CEQA Air Quality Handbook, Chapter 12, Assessing Consistency with Applicable Regional Plans, April 1993.

not cause the Air Basin's criteria pollutant emissions to worsen so as to impede the SCAQMD's efforts to achieve attainment with respect to any criteria pollutant for which it is currently not in attainment of the NAAQS and CAAQS (e.g., ozone, PM10, and PM2.5),[118] or to cause the Air Basin to deteriorate from its current attainment status with respect to any other criteria pollutant emissions.

As further discussed below, the Project is also consistent with the 2016 AQMP, as the Project will incorporate into its design appropriate control strategies set forth in the 2016 AQMP for achieving its emission reduction goals and would be consistent with the demographic and economic assumptions upon which the plan is based.

(a) Construction Growth Projections

The Project would generate short-term construction jobs, but these jobs would not necessarily bring new construction workers or their families into the region since construction workers are typically drawn from an existing regional pool of construction workers who travel among construction sites within the region as individual projects are completed, and are not typically brought from other regions to work on developments such as the Project. Moreover, these jobs would be relatively small in number and temporary in nature. Therefore, the Project's construction jobs would not conflict with the long-term employment or population projections upon which the 2016 AQMP is based.

(b) Operations Growth Projections

The Project is anticipated to be fully operational in 2025 under the overlapping construction scenario or in 2027 under the sequential construction scenario. As discussed in Section IV.J, *Population and Housing*, of this Draft EIR, the Project's growth would be consistent with the growth projections contained in the 2016-2040 RTP/SCS. The Project's proposed 1,005 housing units and the Project with the East Site Hotel Option's proposed 884 housing units would comprise approximately 0.9 percent and 0.8 percent of SCAG's estimated increase of households within the City at opening year, respectively. The Project's proposed 1,005 housing units and the Project with the East Site Hotel Option's proposed 884 housing units would comprise approximately 0.4 percent and 0.3 percent of SCAG's 2040 estimated increase of households within the City, respectively. The Project and the Project with the East Site Hotel Option would result in a slight increase in the number of employees on the Project Site, approximately 206 and 445 employees, respectively, and would comprise approximately 0.1 and 0.3 percent of SCAG's estimated increase of jobs within the City at opening year, and approximately 0.1 and 0.1 percent of SCAG's year 2040 estimated increase of jobs within the City, respectively. As such, the Project and the Project with the East Site Hotel Option would have a very small effect on the overall housing and employment projections for the City

118 The Los Angeles County portion of the Air Basin is designated as nonattainment for the federal lead standard; however, this was due to localized emissions from two lead-acid battery recycling facilities in the City of Vernon and the City of Industry that are no longer operating. For reference see SCAQMD, Board Meeting, Agenda No. 30, Adopt the 2012 Lead State Implementation Plan for Los Angeles County, May 4, 2012.

and Hollywood area. Therefore, the Project's and the Project with the East Site Hotel Option's contribution to housing and employment would be consistent with SCAG housing and employment projections for the City and would have little effect on housing and employment growth projections for the City. The increases in population, housing, and employment would, therefore, be consistent with SCAG's 2016-2040 RTP/SCS goals and would be consistent with the growth projections contained in SCAG's 2016-2040 RTP/SCS, which form the basis of the growth projections in the 2016 AQMP.

As discussed above under Subsection IV.B.3.(b), *Methodology*, projects, uses, and activities that are consistent with the applicable growth projections and control strategies used in the development of the AQMP would not jeopardize attainment of the air quality reductions identified in the AQMP, even if their emissions exceed the SCAQMD's thresholds of significance.[119] The Project and the Project with the East Site Hotel Option would not obstruct implementation of the 2016 AQMP, as discussed below under Thresholds (b), (c), and (d), since its regional construction and operational emissions would be less than significant with implementation of feasible mitigation measures (discussed further below under the *Mitigation Measures* subsection) and its localized construction and operational emissions would be less than significant. **As a result, the Project and the Project with the East Site Hotel Option would be consistent with the assumptions and growth projections in the 2016 AQMP. Impacts would be less than significant.**

(ii) Control Strategies

(a) Construction

During its construction phase, the Project and the Project with the East Site Hotel Option would ensure compliance with CARB's requirements to minimize short-term emissions from on-road and off-road diesel equipment, and with SCAQMD's regulations, such as Rule 403 for controlling fugitive dust and Rule 1113 for controlling VOC emissions from architectural coatings. The Project and the Project with the East Site Hotel Option would also utilize construction contractors in compliance with State on-road and off-road vehicle rules, including the ATCM that limits heavy-duty diesel motor vehicle idling to five minutes at any location (Title 13 CCR, Section 2485), the Truck and Bus regulation that reduces NO_X, PM10, and PM2.5 emissions from existing diesel vehicles operating in California (13 CCR, Section 2025), and the In-Use Off-Road Diesel Fueled Fleets regulation that reduces emissions by the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission controlled models (13 CCR, Section 2449). Compliance with these features and requirements would be consistent with and meets the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities, such as the NO_X and PM10/PM2.5 reduction measures MOB-08 (Accelerated Retirement of Older On-Road Heavy-Duty Vehicles) and MOB-10 (Extension of the Surplus Off-Road Opt-In for NO_X Provision for Construction/Industrial Equipment) in the 2016 AQMP.

[119] SCAQMD, CEQA Air Quality Handbook, April 1993, p. 12-1.

(b) Operations

The Project location, design, and land uses render the Project and the Project with the East Site Hotel Option consistent with the 2016 AQMP during operations. As discussed above, the 2016 AQMP includes transportation control strategies from the 2016-2040 RTP/SCS that are intended to reduce VMT and resulting regional mobile source emissions. The majority of these strategies are to be implemented by cities, counties, and other regional agencies, such as SCAG and SCAQMD although some can be furthered by individual development projects.

The Project and the Project with the East Site Hotel Option location, design, and land uses would support land use and transportation control strategies related to reducing vehicle trips for residents, patrons, and employees by increasing residential and commercial density near public transit. The Project and the Project with the East Site Hotel Option are considered "urban infill" Projects as they would replace existing commercial uses with a high-density, mixed-use development. The Project and the Project with the East Site Hotel Option propose higher density and, consistent with compact growth, are located on an urban infill site accessible to and well served by public transit, such as Metro Local and Rapid bus lines and the Metro Red Line Hollywood/Vine Station, as further described below. New housing and job growth as a result of the completed Project or the Project with the East Site Hotel Option, would be focused in an HQTA. This analysis provides evidence of the Project's and the Project with the East Site Hotel Option's consistency with the 2016 AQMP's goal of reducing mobile source emissions as a source of NO_X and PM2.5.

As described above, by locating its residential uses within an area that has existing high quality public transit (with access to existing regional bus and rail service), employment opportunities, restaurants, and entertainment, all within walking distance, and by including features that support and encourage pedestrian activity and other non-vehicular transportation and increased transit use in Hollywood neighborhood of Los Angeles, the Project would reduce vehicle trips and VMT, and the corresponding reduction in air pollutant emissions.

The Project's mobile source emissions are calculated based on the VMT generated by the Project and the Project with the East Site Hotel Option, as obtained from the Project's Transportation Study,[120] which take into account the Project Site's location within the City, incorporates VMT reductions from the land use characteristics, and Project-specific transportation demand management features (refer to Section IV.L, *Transportation*, for a discussion of the transportation demand management features). Thus, the Project would not conflict with the 2016 AQMP in regard to transportation control strategies from the 2016-2040 RTP/SCS that are intended to reduce VMT and resulting regional mobile source emissions.

120 Fehr & Peers, Transportation Assessment for the Hollywood Center Project, March 2020. Provided in Appendix N-1 of this Draft EIR.

(c) General Plan Air Quality Element

The Project would promote the General Plan Air Quality Element goals, objectives and policies as listed in Subsection IV.B.2.b)(4)(a), *City of Los Angeles Air Quality Element* (see Appendix E of this Draft EIR for additional details). In particular, the Project location and characteristics, as discussed above, would achieve several goals, policies and objectives of the Air Quality Element by locating its development in an urban infill area and by establishing a land use pattern that promotes sustainability. As described above, the Project would support and encourage pedestrian activity in the Hollywood area and contribute to a land use pattern that addresses housing needs. At the same time, the Project would reduce vehicle trips and air pollutant emissions generated by the proposed development by locating residential uses within an identified Transit Priority Area (TPA) that has multiple public transit options (with access to existing regional bus and rail service), and employment opportunities, restaurants and entertainment, all within walking distance. As such, the Project would provide opportunities for the use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in VMT.

The reduction in VMT is supported by a number of land use characteristics, such as proposed development density, location, mix of land uses, proximity to alternative transportation options, and pedestrian oriented design. The Project would increase the site density to approximately 218 dwelling units per acre or 191 dwelling units per acre under the Project with the East Site Hotel Option.[121] Site density is a land use characteristic that reduces emissions associated with transportation as it reduces the distance people travel for work or services and provides a foundation for the implementation of other strategies, such as enhanced transit services.[122] The Project would provide a mix of residential, retail, and restaurant uses, and the Project with the East Site Hotel Option would provide a mix of residential, retail, restaurant, and hotel uses. Increased land use diversity and mixed-uses is a VMT-reducing characteristic for projects that locate different types of land uses near one another since trips between land use types are shorter and can be accommodated by alternative modes of transportation, such as public transit, bicycles, and walking.[123] The Project Site is located in an area that offers access to multiple other nearby destinations, including restaurant, bar, office, retail, entertainment, and residential uses. Increased destination accessibility provides ready access to multiple destinations in close proximity to the Project Site, which encourages walking and non-automotive forms of transportation.[124] The Project Site is also located within a quarter-mile of public transportation, including the Metro Red Line and the Metro

121 The Project Site is 4.61 acres and the Project would have 872 market-rate units and 133 senior affordable housing and the Project with the East Site Hotel Option would have 768 market-rate units and 116 senior affordable housing units; refer to Section IV.J, *Population, Housing and Employment*, of this Draft EIR.

122 CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, 2010, pages 155-158.

123 CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, 2010, pages 162-166.

124 CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, 2010, pages 167-170.

Red Line Hollywood/Vine Station and Metro Local Lines 180, 181 and 217 and Metro Rapid Line 780. Increased transit accessibility facilitates the use of transit by people traveling to or from a location.[125] Furthermore, as discussed in Chapter II, *Project Description*, the Project would improve the street-level pedestrian environment and connectivity to the surrounding Hollywood Neighborhood area, by eliminating five curb cuts, including removal of existing driveways on Vine Street, which would restore continuity to the Hollywood Walk of Fame. Furthermore, the Project's pedestrian paseo and a proposed signalized crossing across Argyle Avenue would facilitate pedestrian connectivity and align with existing mid-block crosswalks on Vine Street and Ivar Avenue. The Project's pedestrian features would be integrated into the adjacent pedestrian network to maintain connections with multimodal facilities. Residents, visitors, patrons, and employees arriving to the Project Site by bicycle would have the same access opportunities as pedestrians and would be able to utilize on-site bicycle parking. Providing pedestrian and bicycle access that minimizes barriers and links the Project Site with existing or planned external streets encourages people to walk instead of drive and reduces VMT.[126]

In September 2010, CAPCOA released a guidance document titled Quantifying Greenhouse Gas Mitigation Measures that provides quantitative methodologies to estimate VMT reductions from land use characteristics.[127] Reducing VMT results in a corresponding reduction in mobile source emissions. According to the CAPCOA guidance, based on the results of these calculations, the Project and the Project with the East Site Hotel Option would achieve at least an approximately 35-percent reduction in VMT from the land use characteristics described above. Refer to Section IV.E, *Greenhouse Gas Emissions*, of this Draft EIR, for additional details regarding the Project Site land use characteristics and reductions in VMT, as estimated from the CAPCOA guidance document. This reduction in VMT would not conflict with the General Plan Air Quality Element, which supports less reliance on single-occupant vehicles, reducing land use transportation emissions and associated air quality impacts, and providing citizens with less polluting transportation options.

Based on the above analysis, the Project and the Project with the East Site Hotel Option would be consistent with, not conflict with, applicable air quality policies of the General Plan's Air Quality Element, and impacts would be less than significant.

(2) Mitigation Measures

Impacts regarding the Project's consistency with applicable air quality plans were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

125 CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, 2010, pages 171-175.
126 CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, 2010, pages 186-189.
127 CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, August 2010.

(3) Level of Significance After Mitigation

Impacts regarding the Project's consistency with applicable air quality plans were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

Although the East Senior Building under the Project with the East Site Hotel Option would be two floors shorter than under the Project, construction would require the same construction equipment as the Project. The construction duration for the Project with the East Site Hotel Option would slightly decrease due to construction of a shorter building. However, the amount of maximum daily construction equipment and emissions, which is the basis for the analysis, would be the same for the Project and the Project with the East Site Hotel Option. Accordingly, Project-related construction air quality impacts would be the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the construction air quality impact analysis, mitigation measures, and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option under Threshold (b) for construction.

During operations, since hotel uses generate different vehicle trip rates and VMT and have different building energy demand factors compared to multi-family residential uses, the operational emissions analysis under Threshold (b) includes separate Project and the Project with the East Site Hotel Option scenarios. Accordingly, separate operational impact analyses, conclusions regarding the impact significance, and mitigation measures are provided for the Project and the Project with the East Site Hotel Option under Threshold (b) for operations.

(1) Impact Analysis

The Project would contribute to local and regional air pollutant emissions during construction (short-term or temporary) and occupancy (long-term). Based on the following analysis, construction of the Project would result in a potentially significant impact relative to the maximum daily emissions of NO_X as compared to the SCAQMD regional significance thresholds for construction criteria air pollutant emissions in which the region is non-attainment under the CAAQS or NAAQS. Therefore, a mitigation measure would be required. In addition, and as demonstrated below, construction emissions would not exceed the SCAQMD regional significance thresholds for the remaining non-attainment, attainment, maintenance, or unclassifiable criteria air pollutants (i.e., ozone precursors of VOCs, PM10, PM2.5, CO and SO_2).

Operation of the Project would result in less-than-significant impacts relative to the maximum daily emissions as compared to the SCAQMD regional significance thresholds for operational criteria air pollutant emissions in which the region is non-attainment under

the CAAQS or NAAQS (i.e., ozone precursors of VOCs and NO_X, PM10, and PM2.5). However, operation of the Project with the East Site Hotel Option would result in a potentially significant impact relative to the maximum daily emissions of NO_X, which is an ozone precursor. Therefore, a mitigation measure would be required. As shown below, construction and operational emissions would not exceed the SCAQMD regional significance thresholds for attainment, maintenance, or unclassifiable criteria air pollutants (i.e., CO and SO_2). With respect to the State-identified criteria pollutants (i.e., sulfates, hydrogen sulfide, visibility reducing particles, and vinyl chloride), the Project and the Project with the East Site Hotel Option would either not emit them (i.e., hydrogen sulfide and vinyl chloride) or they would be accounted for as part of the pollutants estimated in this analysis (i.e., sulfates and visibility reducing particles). For example, visibility reducing particles are associated with particulate matter emissions and sulfates are associated with SO_2 emissions. Both particulate matter and SO_2 are included in the emissions estimates for the Project and the Project with the East Site Hotel Option.

(a) Construction

Construction of the Project has the potential to generate temporary regional criteria pollutant emissions through the use of heavy-duty construction equipment, such as excavators and forklifts, through vehicle trips generated by workers and haul trucks traveling to and from the Project Site and through building activities, such as the application of paint and other surface coatings. In addition, fugitive dust emissions would result from demolition and various soil-handling activities. Mobile source emissions, primarily NO_X, would result from the use of construction equipment such as dozers and loaders. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of construction activity, and prevailing weather conditions.[128]

The maximum daily construction emissions for the Project were estimated for each construction phase. During construction of the West Site or the East Site, some individual construction phases could potentially occur concurrently; therefore, the estimated maximum daily emissions include these potentially concurrent construction phases by combining the relevant construction phase emissions. In addition, under the overlapping construction scenario, construction of the West Site and the East Site would also occur concurrently. The maximum daily emissions take into account overlapping construction phases for each site, as well as overlapping construction of the West Site and the East Site. The maximum daily emissions are predicted values for a representative worst-case day and do not represent the actual emissions that would occur for every day of construction, which would likely be lower on many days. As stated above, in order to provide a conservative emissions analysis, for modeling purposes, construction emissions were modeled under the overlapping construction scenario beginning in 2021

[128] Impacts from asbestos and lead-based paint from Project demolition are expected to be less than significant. For additional details, refer to Section IV.F, *Hazards and Hazardous Materials,* of this Draft EIR.

and full Project buildout in 2025. Detailed emissions calculations are provided in Appendix E of this Draft EIR.

The results of the criteria pollutant calculations are presented in **Table IV.B-5**, *Estimated Maximum Regional Construction Emissions for Project*. The calculations in Table IV.B-5 incorporate compliance with dust control measures required to be implemented during each phase of construction by SCAQMD Rule 403 (Control of Fugitive Dust) and fugitive VOC control measures required to be implemented by architectural coating emission factors based on SCAQMD Rule 1113 (Architectural Coatings).

TABLE IV.B-5
ESTIMATED MAXIMUM REGIONAL CONSTRUCTION EMISSIONS FOR THE PROJECT UNDER THE OVERLAPPING CONSTRUCTION SCENARIO (POUNDS PER DAY) [a]

Source	VOC	NO_X	CO	SO_2	PM10 [b]	PM2.5 [b]
Overlapping Phases						
West Site: Demolition + Site Preparation + Utilities/Trenching (2021)	5	57	39	0.1	5	3
West Site: Demolition + Site Preparation + Grading/Excavation (2021)	8	**132**	69	0.4	13	6
West Site: Grading/Excavation (2022)	2	19	29	0.1	3	1
West Site: Foundations/Concrete Pour (2022)	2	24	25	0.1	5	2
West: Building Construction (2022) East: Site Preparation + Utilities/Trenching + Grading/Excavation (2022)	8	**123**	95	0.5	20	8
West: Building Construction (2022) East: Grading/Excavation (2022)	6	93	77	0.4	17	6
West: Building Construction + Architectural Coating (2022) East: Grading/Excavation (2022)	20	93	80	0.4	17	6
West: Building Construction + Architectural Coating (2023) East: Grading/Excavation (2023)	18	44	71	0.2	12	4
West: Building Construction + Architectural Coatings (2023) East: Foundations/Concrete Pour (2023)	18	42	63	0.2	12	4
West: Building Construction + Architectural Coatings (2023) East: Building Construction (2023)	19	56	83	0.3	17	6
West: Building Construction + Architectural Coatings + Paving (2023) East: Building Construction (2023)	21	72	102	0.3	18	7
West: Building Construction + Architectural Coatings (2023) East: Building Construction + Architectural Coatings (2023)	32	55	85	0.3	17	6

TABLE IV.B-5
ESTIMATED MAXIMUM REGIONAL CONSTRUCTION EMISSIONS FOR THE PROJECT UNDER THE OVERLAPPING CONSTRUCTION SCENARIO (POUNDS PER DAY) [a]

Source	VOC	NO_X	CO	SO_2	PM10 [b]	PM2.5 [b]
West: Building Construction + Architectural Coatings (2024) East: Building Construction + Architectural Coatings (2024)	32	51	83	0.3	16	6
East: Building Construction + Architectural Coatings + Paving (2024)	17	41	58	0.2	9	4
East: Building Construction + Architectural Coatings (2025)	15	24	40	0.1	8	3
Maximum Daily Emissions	32	**132**	102	0.5	20	8
SCAQMD Thresholds of Significance	**75**	**100**	**550**	**150**	**150**	**55**
Exceeds Thresholds?	No	**Yes**	No	No	No	No

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix E of this Draft EIR.

[b] Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

SOURCE: ESA, 2020.

As shown in Table IV.B-5, construction-related daily emissions would exceed the SCAQMD thresholds of significance for NO_X and emissions levels would be below the applicable thresholds of significance. **Therefore, the Project's or the Project with the East Site Hotel Option's construction impacts would be potentially significant.**

(b) Operations

Mobile, stationary, and area source operational regional criteria pollutant emissions were calculated for the Project and the Project with the East Site Hotel Option scenarios for full buildout year 2025 under the overlapping construction schedule. Operational emission estimates assume implementation of Project Design Feature GHG-PDF-1 in Section IV.E, *Greenhouse Gas Emissions*, of this Draft EIR, which includes increased energy efficiency features. Reductions in building energy and resource consumption due to physical and operational Project characteristics for which sufficient data are available to enable quantification have been included in the quantitative analysis and include, but are not limited to, characteristics, such as the installation of energy efficient appliances and reduced building energy usage sufficient to meet the applicable Title 24 Energy Efficiency Standards for Residential and Nonresidential Buildings. Operational emissions estimates include compliance with SCAQMD Rule 1113 (Architectural Coatings), which limits the VOC content of architectural coatings, which would be applied during typical building maintenance activities. Detailed emissions calculations are provided in Appendix E of this Draft EIR.

Daily trip generation rates and VMT for the Project and the Project with the East Site Hotel Option were provided in the Project's Transportation Assessment[129] and include trips associated with the proposed multi-family residences and retail space/restaurants, as well as hotel uses under the Project with the East Site Hotel Option. The VMTs include reductions attributable to the Project characteristics, as discussed previously.

Natural gas usage factors are based on commercial and residential data from the California Energy Commission, and landscape equipment emissions are based on off-road emission factors from CARB. Emissions from the use of consumer products and the reapplication of architectural coatings are based on data provided in CalEEMod.

The results of the regional criteria pollutant emission calculations for VOC, NO_X, CO, SO_2, PM10, and PM2.5 are presented in **Table IV.B-6,** *Estimated Maximum Regional Operational Emissions for West Site Buildout in 2024*, **Table IV.B-7,** *Estimated Maximum Regional Operational Emissions for Project Buildout in 2025*, and **Table IV.B-8,** *Estimated Maximum Regional Operational Emissions for the Project with the East Site Hotel Option Buildout in 2025.* **The operational-related daily emissions from the Project and the Project with the East Site Hotel Option would exceed the SCAQMD thresholds of significance for NO_X in year 2025. Therefore, operational impacts would be considered potentially significant.**

TABLE IV.B-6
ESTIMATED MAXIMUM REGIONAL OPERATIONAL EMISSIONS FOR THE WEST SITE BUILDOUT IN 2024 (POUNDS PER DAY) [a]

Source	VOC	NO_X	CO	SO_2	PM10	PM2.5
Project						
Area (Coating, Consumer Products, Landscaping)	17	<1	43	<1	<1	<1
Stationary (Charbroilers)	<1	-	-	-	<1	<1
Stationary (Cooling Tower)	-	-	-	-	<1	<1
Stationary (Emergency Generators)	2	30	17	<1	<1	<1
Energy	<1	2	1	<1	<1	<1
Mobile	3	5	30	<1	9	2
Total Project	23	38	91	<1	10	3
SCAQMD Thresholds of Significance	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Thresholds?	No	No	No	No	No	No

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix E of this Draft EIR.

SOURCE: ESA, 2020.

[129] Fehr & Peers, Transportation Assessment for the Hollywood Center Project, March 2020. Provided in Appendix N-1 of this Draft EIR.

TABLE IV.B-7
ESTIMATED MAXIMUM REGIONAL OPERATIONAL EMISSIONS FOR THE PROJECT BUILDOUT IN 2025 (POUNDS PER DAY) [a]

Source	VOC	NO_X	CO	SO_2	PM10	PM2.5
Project						
Area (Coating, Consumer Products, Landscaping)	35	1	83	<1	<1	<1
Stationary (Charbroilers)	<1	-	-	-	1	1
Stationary (Cooling Tower)	-	-	-	-	<1	<1
Stationary (Emergency Generators)	3	60	34	<1	<1	<1
Energy	<1	4	3	<1	<1	<1
Mobile	7	11	61	<1	19	5
Total Project	**45**	**76**	**181**	**<1**	**21**	**7**
SCAQMD Thresholds of Significance	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Thresholds?	No	**Yes**	No	No	No	No

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix E of this Draft EIR.

SOURCE: ESA, 2020.

TABLE IV.B-8
ESTIMATED MAXIMUM REGIONAL OPERATIONAL EMISSIONS FOR THE PROJECT WITH THE EAST SITE HOTEL OPTION BUILDOUT IN 2025 (POUNDS PER DAY) [a]

Source	VOC	NO_X	CO	SO_2	PM10	PM2.5
Project						
Area (Coating, Consumer Products, Landscaping)	34	1	73	<1	<1	<1
Stationary (Charbroilers)	<1	-	-	-	1	1
Stationary (Cooling Tower)	-	-	-	-	<1	<1
Stationary (Emergency Generators)	3	60	34	<1	<1	<1
Energy	1	5	3	<1	<1	<1
Mobile	8	13	72	<1	22	6
Total Project	**46**	**79**	**183**	**<1**	**25**	**8**
SCAQMD Thresholds of Significance	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Thresholds?	No	**Yes**	No	No	No	No

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix E of this Draft EIR.

SOURCE: ESA, 2020.

(2) Mitigation Measures

(a) Construction

The following mitigation measure would reduce potentially significant impacts regarding construction emissions.

AQ-MM-1: Construction Equipment Features. The Applicant shall implement the following construction equipment features for equipment operating at the Project Site. These features shall be included in applicable bid documents, and successful contractor(s) must demonstrate the ability to supply such equipment. Construction features shall include the following:

- The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (USEPA) Tier 4 Final off-road emissions standards or equivalent for equipment rated at 50 horsepower (hp) or greater during Project construction where available within the Los Angeles region. Such equipment shall be outfitted with Best Available Control Technology (BACT), which means a CARB-certified Level 3 DPM or equivalent.

- Construction equipment, such as tower cranes, shall utilize electricity from power poles or alternative fuels (i.e., non-diesel) rather than diesel power generators and/or gasoline power generators. Pole power shall be made available for use for electric tools, equipment, lighting, etc. If stationary construction equipment, such as diesel- or gasoline-powered generators, must be operated continuously, such equipment shall be located at least 100 feet from sensitive land uses (e.g., residences, schools, childcare centers, hospitals, parks, or similar uses), whenever possible.
- Contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. All construction equipment must be properly tuned and maintained in accordance with the manufacturer's specifications. The contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications. Tampering with construction equipment to increase horsepower or to defeat emission control devices shall be prohibited.

(b) Operations

The following mitigation measure would reduce potentially significant impacts regarding operational emissions.

AQ-MM-2: Emergency Generators. The Project representative shall schedule routine maintenance and testing of the emergency generators installed on the Project Site on different days. Prior to the installation of emergency generators, the Project representative shall supply documentation to the City that emergency generator testing by contractors, service providers, or maintenance crews shall be conducted

in accordance with the specified requirements. The Project representative shall maintain records of emergency generator testing, including testing dates, which shall be made available to the City upon request.

(3) Level of Significance After Mitigation

(a) Construction

Construction of the Project would result in emissions that exceed the NO_X regional threshold, and, as such, impacts would be potentially significant prior to mitigation. With implementation of Mitigation Measure AQ-MM-1, the regional NO_X emissions would be reduced to a level below the SCAQMD regional threshold of 100 pounds per day, as shown in **Table IV.B-9,** *Estimated Maximum Mitigated Regional Construction Emissions for the Project under the Overlapping Construction Scenario (pounds per day).* By implementing mitigation that requires Tier 4 Final off-road emissions standards or equivalent for equipment rated at 50 horsepower, employs construction equipment, such as tower cranes that utilize electricity from power poles or alternative fuels (i.e., non-diesel), daily construction equipment emissions would be reduced compared to construction equipment without these features. With implementation of Mitigation Measure AQ-MM-1, regional NO_X emissions from construction would be reduced to below the regional threshold for NO_X, and impacts related to regional NO_X construction emissions would be less-than-significant.

TABLE IV.B-9
ESTIMATED MAXIMUM MITIGATED REGIONAL CONSTRUCTION EMISSIONS FOR THE PROJECT UNDER THE OVERLAPPING CONSTRUCTION SCENARIO (POUNDS PER DAY) [a]

Source	VOC	NO_X	CO	SO_2	PM10 [b]	PM2.5 [b]
Overlapping Phases						
West Site: Demolition + Site Preparation + Utilities/Trenching (2021)	2	25	42	0.1	3	1
West Site: Demolition + Site Preparation + Grading/Excavation (2021)	5	92	80	0.4	12	4
West Site: Grading/Excavation (2022)	1	4	36	0.1	3	1
West Site: Foundations/Concrete Pour (2022)	1	14	26	0.1	4	1
West: Building Construction (2022) East: Site Preparation + Utilities/Trenching + Grading/Excavation (2022)	4	74	103	0.5	18	5
West: Building Construction (2022) East: Grading/Excavation (2022)	3	59	84	0.4	16	5
West: Building Construction + Architectural Coating (2022) East: Grading/Excavation (2022)	16	56	87	0.4	16	5

TABLE IV.B-9
ESTIMATED MAXIMUM MITIGATED REGIONAL CONSTRUCTION EMISSIONS FOR THE PROJECT UNDER THE OVERLAPPING CONSTRUCTION SCENARIO (POUNDS PER DAY) [a]

Source	VOC	NO_X	CO	SO_2	PM10 [b]	PM2.5 [b]
West: Building Construction + Architectural Coating (2023) East: Grading/Excavation (2023)	15	11	78	0.2	10	3
West: Building Construction + Architectural Coatings (2023) East: Foundations/Concrete Pour (2023)	15	15	63	0.2	11	3
West: Building Construction + Architectural Coatings (2023) East: Building Construction (2023)	15	17	82	0.3	15	4
West: Building Construction + Architectural Coatings + Paving (2023) East: Building Construction (2023)	16	19	104	0.3	15	4
West: Building Construction + Architectural Coatings (2023) East: Building Construction + Architectural Coatings (2023)	28	14	84	0.2	15	4
West: Building Construction + Architectural Coatings (2024) East: Building Construction + Architectural Coatings (2024)	28	14	82	0.2	15	4
East: Building Construction + Architectural Coatings + Paving (2024)	14	10	62	0.2	8	2
East: Building Construction + Architectural Coatings (2025)	14	7	40	0.1	7	2
Maximum Daily Emissions	28	92	104	0.5	18	5
SCAQMD Thresholds of Significance	**75**	**100**	**550**	**150**	**150**	**55**
Exceeds Thresholds?	No	No	No	No	No	No

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix E of this Draft EIR.

[b] Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

SOURCE: ESA, 2020.

(b) Operations

Operational emissions would result in emissions that exceed the NO_X regional threshold, and, as such, impacts would be potentially significant prior to mitigation. With implementation of Mitigation Measure AQ-MM-2, the regional NO_X emissions would be reduced to a level below the SCAQMD regional threshold of 55 pounds per day, as shown in **Table IV.B-10**, *Estimated Maximum Mitigated Regional Operational Emissions for the West Site in 2024,* and **Table IV.B-11,** *Estimated Maximum Mitigated Regional*

Operational Emissions for the Project Buildout in 2025, and **Table IV.B-12,** *Estimated Maximum Mitigated Regional Operational Emissions for the Project with the East Site Hotel Option in 2025.* By implementing mitigation that restricts the emergency generator testing/maintenance to one emergency generator per day, the emergency generator emissions occurring in a day would be reduced compared to potentially testing multiple generators on the same day, as daily emissions determine the significance of impacts. With implementation of Mitigation Measure AQ-MM-2, regional NO_X emissions from operations would be reduced to below the regional threshold for NO_X, and impacts related to regional NO_X operational emissions would be mitigated to a less-than-significant level.

TABLE IV.B-10
ESTIMATED MAXIMUM MITIGATED REGIONAL OPERATIONAL EMISSIONS FOR THE WEST SITE BUILDOUT IN 2024 (POUNDS PER DAY) [a]

Source	VOC	NO_X	CO	SO_2	PM10	PM2.5
Project						
Area (Coating, Consumer Products, Landscaping)	17	<1	43	<1	<1	<1
Stationary (Charbroilers)	<1	-	-	-	<1	<1
Stationary (Cooling Tower)	-	-	-	-	<1	<1
Stationary (Emergency Generators)	2	30	17	<1	<1	<1
Energy	<1	2	1	<1	<1	<1
Mobile	3	5	30	<1	9	2
Total Project	23	38	91	**<1**	**10**	**3**
SCAQMD Thresholds of Significance	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Thresholds?	No	No	No	No	No	No

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix E of this Draft EIR.

SOURCE: ESA, 2020.

TABLE IV.B-11
ESTIMATED MAXIMUM MITIGATED REGIONAL OPERATIONAL EMISSIONS FOR THE PROJECT BUILDOUT IN 2025 (POUNDS PER DAY) [a]

Source	VOC	NO_X	CO	SO_2	PM10	PM2.5
Project						
Area (Coating, Consumer Products, Landscaping)	35	1	83	<1	<1	<1
Stationary (Charbroilers)	<1	-	-	-	1	1
Stationary (Cooling Tower)	-	-	-	-	<1	<1
Stationary (Emergency Generators)	2	30	17	<1	<1	<1
Energy	<1	4	3	<1	<1	<1
Mobile	7	11	61	<1	19	5
Total Project	**44**	**46**	**164**	**<1**	**21**	**7**
SCAQMD Thresholds of Significance	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Thresholds?	No	No	No	No	No	No

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix E of this Draft EIR.

SOURCE: ESA, 2020.

TABLE IV.B-12
ESTIMATED MAXIMUM MITIGATED REGIONAL OPERATIONAL EMISSIONS FOR THE PROJECT WITH THE EAST SITE HOTEL OPTION BUILDOUT IN 2025 (POUNDS PER DAY) [a]

Source	VOC	NO_X	CO	SO_2	PM10	PM2.5
Project						
Area (Coating, Consumer Products, Landscaping)	34	1	73	<1	<1	<1
Stationary (Charbroilers)	<1	-	-	-	1	1
Stationary (Cooling Tower)	-	-	-	-	<1	<1
Stationary (Emergency Generators)	2	30	17	<1	<1	<1
Energy	1	5	3	<1	<1	<1
Mobile	8	13	72	<1	22	6
Total Project	**44**	**49**	**166**	**<1**	**25**	**8**
SCAQMD Thresholds of Significance	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Thresholds?	No	No	No	No	No	No

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix E of this Draft EIR.

SOURCE: ESA, 2020.

Threshold (c): Would the Project expose sensitive receptors to substantial pollutant concentrations?

Although the East Senior Building under the Project with the East Site Hotel Option would be two floors shorter than under the Project, construction would require the same construction equipment as the Project. The construction duration for the Project with the East Site Hotel Option would slightly decrease due to construction of the shorter building. However, the amount of maximum daily construction equipment and emissions, which is the basis for the analysis, would be the same for the Project and the Project with the East Site Hotel Option. Accordingly, air quality impacts associated with Project-related construction localized emissions and TAC emissions would be the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the construction air quality impact analysis, and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option under Threshold (c) for construction.

During Project operation, since hotel uses generate different vehicle trip rates and VMT and have different building energy demand factors compared to multi-family residential uses, the localized operational emissions analysis under Threshold (c) includes separate Project and the Project with the East Site Hotel Option scenarios. Accordingly, separate impact analyses, conclusions regarding the impact significance, and mitigation measures are provided for the Project and the Project with the East Site Hotel Option under Threshold (c) for operations.

During Project operation, the impact analysis regarding CO hotpots presents CO concentration data for the Project and the Project with the East Site Hotel Option, both of which are the same and well below the applicable significance threshold criteria. Accordingly, Project-related CO hotspot impacts would be the same under the Project or the Project with the East Site Hotel Option. Thus, the conclusions regarding the CO impact analysis, mitigation measure, and impact significance presented below are the same and apply to the Project or the Project with the East Site Hotel Option.

Finally, during Project operation and in regard to TACs, the uses proposed under the Project or the Project with the East Site Hotel Option, would generate the same type of pollutants that are considered TACs that are typical of similar mixed-use developments. Accordingly, Project-related operational TAC impacts would be the same under the Project or the Project with the East Site Hotel Option. Thus, the conclusions regarding the operational TAC impact analysis, mitigation measure, and impact significance presented below are the same and apply to the Project or the Project with the East Site Hotel Option.

(1) Impact Analysis

(a) Localized Construction Emissions

As explained above, the localized construction air quality analysis was conducted using the methodology prescribed in the SCAQMD Final Localized Significance Threshold

Methodology.[130] The screening criteria provided in the Final Localized Significance Threshold Methodology were used to determine localized construction emissions thresholds for the Project. The maximum daily localized emissions for each of the construction phases and the localized significance thresholds are presented in **Table IV.B-13**, *Estimated Maximum Localized Construction Emissions for Project*. The same phasing and equipment assumptions, and compliance with SCAQMD Rule 403 and Rule 1113, were used as for the regional emissions calculations discussed above.

As shown, maximum localized construction emissions for sensitive receptors would be below the localized screening thresholds for NO_X, CO, PM10, and PM2.5. **As the Project's maximum localized construction emissions would not exceed the localized thresholds for NO_X, CO, PM10, and PM2.5, its construction emissions impacts to sensitive receptors would be less than significant.**

(b) Localized Operational Emissions

The localized operational air quality analysis was conducted using the methodology prescribed in the SCAQMD Localized Significance Threshold Methodology. The screening criteria provided in the Localized Significance Threshold Methodology were used to determine the localized operational emissions thresholds of significance for the Project and the Project with the East Site Hotel Option. The same assumptions, including compliance with the Title 24 Energy Efficiency Standards for Residential and Nonresidential Buildings, California Green Building Standards (CALGreen) Code, and City of Los Angeles Green Building Code, were used in the analysis.

The maximum daily localized emissions and the localized significance thresholds are presented in **Table IV.B-14,** *Estimated Maximum Localized Operational Emissions for the West Site Buildout in 2024, and* **Table IV.B-15,** *Estimated Maximum Localized Operational Emissions for the Project Buildout in 2025* and **Table IV.B-16,** *Estimated Maximum Localized Operational Emissions for the Project with the East Site Hotel Option Buildout in 2025*. **As the maximum localized operational emissions under the Project and Project with the East Site Hotel Option would not exceed the localized thresholds for NO_X, CO, PM10, or PM2.5, operational emissions impacts to sensitive receptors would be less than significant.**

130 SCAQMD, Final Localized Significance Threshold Methodology, June 2003 and revised July 2008.

TABLE IV.B-13
ESTIMATED MAXIMUM LOCALIZED CONSTRUCTION EMISSIONS FOR THE PROJECT UNDER THE OVERLAPPING CONSTRUCTION SCENARIO (POUNDS PER DAY) [a]

Source	NO_X	CO	PM10 [b]	PM2.5 [b]
Overlapping Phases				
West Site: Demolition + Site Preparation + Utilities/Trenching (2021)	36	34	1.8	1.7
West Site: Demolition + Site Preparation + Grading/Excavation (2021)	46	45	2.2	2.0
West Site: Grading/Excavation (2022)	19	21	0.8	0.7
West Site: Foundations/Concrete Pour (2022)	13	13	0.6	0.6
West: Building Construction (2022) East: Site Preparation + Utilities/Trenching + Grading/Excavation (2022)	56	56	2.6	2.4
West: Building Construction (2022) East: Grading/Excavation (2022)	41	41	1.8	1.7
West: Building Construction + Architectural Coating (2022) East: Grading/Excavation (2022)	44	45	2.0	1.9
West: Building Construction + Architectural Coating (2023) East: Grading/Excavation (2023)	40	44	1.8	1.7
West: Building Construction + Architectural Coatings (2023) East: Foundations/Concrete Pour (2023)	35	35	1.6	1.5
West: Building Construction + Architectural Coatings (2023) East: Building Construction (2023)	44	43	2.0	1.9
West: Building Construction + Architectural Coatings + Paving (2023) East: Building Construction (2023)	62	62	3.1	2.9
West: Building Construction + Architectural Coatings (2023) East: Building Construction + Architectural Coatings (2023)	47	46	2.2	2.1
West: Building Construction + Architectural Coatings (2024) East: Building Construction + Architectural Coatings (2024)	44	46	1.9	1.8
East: Building Construction + Architectural Coatings + Paving (2024)	37	39	1.6	1.5
East: Building Construction + Architectural Coatings (2025)	20	23	0.9	0.8
Maximum Localized (On-Site) Emissions	62	62	3.1	2.9
SCAQMD Screening Thresholds of Significance [c]	**154**	**1,755**	**15.0**	**7.6**
Exceed Thresholds?	No	No	No	No

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix E of this Draft EIR.

[b] Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

[c] The SCAQMD LSTs are based on Source Receptor Area 1 (Central Los Angeles County) for a 4.61-acre site with sensitive receptors conservatively assumed to be located adjacent to the construction area.

SOURCE: ESA, 2020.

TABLE IV.B-14
ESTIMATED MAXIMUM LOCALIZED OPERATIONAL EMISSIONS FOR THE WEST SITE BUILDOUT IN 2024 (POUNDS PER DAY) [a]

Source	NO_X	CO	PM10	PM2.5
Area (Coating, Consumer Products, Landscaping)	<1	43	0.2	0.2
Energy	2	1	0.2	0.2
Stationary (Charbroilers)	-	-	0.4	0.3
Stationary (Cooling Tower)	-	-	0.2	0.1
Stationary (Emergency Generators)	30	17	0.1	0.1
Total Localized (On-Site) Emissions	32	61	1.1	0.9
SCAQMD Screening Thresholds of Significance [b]	**105**	**1,019**	**2.0**	**1.9**
Exceeds Thresholds?	No	No	No	No

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix E of this Draft EIR.

[b] The SCAQMD LSTs are based on Source Receptor Area 1 (Central Los Angeles County) for a 1.92-acre site with sensitive receptors conservatively assumed to be located adjacent to the Project Site for operational emissions for LST purposes.

SOURCE: ESA, 2020.

TABLE IV.B-15
ESTIMATED MAXIMUM LOCALIZED OPERATIONAL EMISSIONS FOR THE PROJECT BUILDOUT IN 2025 (POUNDS PER DAY) [a]

Source	NO_X	CO	PM10	PM2.5
Area (Coating, Consumer Products, Landscaping)	1	83	0.5	0.5
Energy	4	3	0.3	0.3
Stationary (Charbroilers)	-	-	0.9	0.5
Stationary (Cooling Tower)	-	-	0.2	0.2
Stationary (Emergency Generators)	60	34	0.3	0.2
Total Localized (On-Site) Emissions	65	120	2.2	1.8
SCAQMD Screening Thresholds of Significance [b]	**154**	**1,755**	**3.7**	**2.0**
Exceeds Thresholds?	No	No	No	No

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix E of this Draft EIR.

[b] The SCAQMD LSTs are based on Source Receptor Area 1 (Central Los Angeles County) for a 4.61-acre site with sensitive receptors conservatively assumed to be located adjacent to the Project Site for operational emissions for LST purposes.

SOURCE: ESA, 2020.

TABLE IV.B-16
ESTIMATED MAXIMUM LOCALIZED OPERATIONAL EMISSIONS FOR THE PROJECT WITH THE EAST SITE HOTEL OPTION BUILDOUT IN 2025 (POUNDS PER DAY) [a]

Source	NO_x	CO	PM10	PM2.5
Area (Coating, Consumer Products, Landscaping)	1	73	0.4	0.4
Energy	5	3	0.4	0.4
Stationary (Charbroilers)	-	-	0.9	0.5
Stationary (Cooling Tower)	-	-	0.3	0.3
Stationary (Emergency Generators)	60	34	0.1	0.1
Total Localized (On-Site) Emissions	66	111	2.2	1.8
SCAQMD Screening Thresholds of Significance [b]	**154**	**1,755**	**3.7**	**2.0**
Exceeds Thresholds?	No	No	No	No

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix E of this Draft EIR.

[b] The SCAQMD LSTs are based on Source Receptor Area 1 (Central Los Angeles County) for a 4.61-acre site with sensitive receptors conservatively assumed to be located adjacent to the Project Site for operational emissions for LST purposes.

SOURCE: ESA, 2020.

(c) Carbon Monoxide Hotspots

The potential for the Project to cause or contribute to CO hotspots was evaluated by comparing Project intersection traffic volumes with prior studies conducted by the SCAQMD in support of their AQMPs and considering existing background CO concentrations. As discussed below, this comparison demonstrates that the Project would not cause or contribute considerably to the formation of CO hotspots, that CO concentrations at Project-impacted intersections would remain well below the threshold one-hour and eight-hour ambient air quality standards (CAAQS) of 20 or 9.0 parts per million (ppm), respectively within one-quarter mile of a sensitive receptor, and that no further CO analysis is warranted or required.

As shown previously in Table IV.B-3, CO levels in the Project Site area are substantially below the federal and the State standards. Maximum CO levels in recent years were 3.2 ppm (one-hour average) and 1.8 ppm (eight-hour average) as compared to the criteria of 20 ppm (CAAQS one-hour average) or 35 ppm (NAAQS one-hour average) and 9.0 ppm (eight-hour average). No exceedances of the CO standards have been recorded at monitoring stations in the Air Basin for some time,[131] and the Air Basin is currently designated as a CO attainment area for both the CAAQS and the NAAQS.

131 SCAQMD, Final 2012 AQMP, February 2013, pp. 2-22.

The SCAQMD conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the Air Basin. These include: (a) Wilshire Boulevard and Veteran Avenue; (b) Sunset Boulevard and Highland Avenue; (c) La Cienega Boulevard and Century Boulevard; and (d) Long Beach Boulevard and Imperial Highway. In the 2003 AQMP CO attainment demonstration, the SCAQMD notes that the intersection of Wilshire Boulevard and Veteran Avenue is the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day.[132] Relevant information from the 2003 AQMP CO attainment demonstration relied upon in this assessment is provided in Appendix E of this Draft EIR. This intersection is located near the on- and off-ramps to Interstate 405 in West Los Angeles. The evidence provided in Table 4-10 of Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions (i.e., excluding background concentrations) at these four intersections was 4.6 ppm (one-hour average) and 3.2 ppm (eight-hour average) at Wilshire Boulevard and Veteran Avenue.[133]

Based on the Project's Transportation Assessment,[134] the intersection of Vine Street and Sunset Boulevard would have a maximum traffic volume of approximately 78,380 ADT under the Project buildout scenario and a maximum traffic volume of approximately 78,420 under the Project with the East Site Hotel Option scenario based on future year 2027 traffic volumes, and is assumed to operate at very low or idling speeds as a congested roadway intersection. As a result, CO concentrations from the Project's maximum traffic volume at the intersection identified above plus the measured background level in the Project Site area are expected to be approximately 6.8 ppm (one-hour average) and 4.3 ppm (eight-hour average) under the Project or the Project with the East Site Hotel Option, which would not exceed the thresholds of significance. Total traffic volumes at the most impacted intersection would likely have to more than double to cause or contribute to a CO hotspot impact, given that vehicles operating today have reduced CO emissions as compared to vehicles operating in year 2003 when the SCAQMD conducted the AQMP attainment demonstration modeling.[135] This comparison demonstrates that the Project would not contribute to the formation of CO hotspots and that no further CO analysis is required. **The Project would result in less-than-significant impacts with respect to CO hotspots. The Project would not contribute to the formation of CO hotspots, and no further CO analysis is required.**

132 SCAQMD, 2003 AQMP, Appendix V: Modeling and Attainment Demonstrations, August 2003, pp. V-4 through V-24.

133 The eight-hour average is based on a 0.7 persistence factor, as recommended by the SCAQMD.

134 Fehr & Peers, Transportation Assessment for the Hollywood Center Project, March 2020. Provided in Appendix N-1 of this Draft EIR.

135 SCAQMD, 2003 AQMP, Chapter 6 Clean Air Act Requirements, August 2003.

(d) Toxic Air Contaminant Emissions

(i) Construction Emissions

Temporary TAC emissions associated with DPM emissions from heavy construction equipment would occur during construction activities. According to OEHHA and SCAQMD's Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis,[136] health effects from TACs are described in terms of individual cancer risk based on a lifetime (i.e., 70-year) resident exposure duration. Given the temporary construction schedule of approximately 4.5 years under the overlapping construction scenario and approximately 7 years under the sequential scenario, the Project would not result in a long-term (i.e., lifetime or 70-year) exposure as a result of construction activities.

In addition, the Project would be consistent with the applicable 2016 AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. The Project would comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than 5 minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these would minimize emissions of TACs during construction. The Project would also comply with the requirements of SCAQMD Rule 1403 if asbestos is found during the demolition and construction activities. In addition, as stated in Section IV.F, *Hazards and Hazardous Materials,* of this Draft EIR, demolition activities for the Project would include the removal of existing buildings, structures, and associated infrastructure. As such, hazardous materials may be present in the structures because of their age. The hazardous materials may include asbestos-containing materials and lead based paint. Numerous existing regulations require that demolition activities that may disturb or require the removal of materials that consist of, contain, or are coated with hazardous materials must be inspected and/or tested for the presence of hazardous materials. If present, the hazardous materials are required to be managed and disposed of in accordance with applicable laws and regulations.[137] The nearest residential air quality sensitive receptors are located adjacent to the Project Site on the north and west.

While a quantified construction HRA is not required to be conducted, for informational purposes only, a refined quantitative construction HRA has been prepared, the details of which are provided in Appendix E of this Draft EIR. The results of the construction HRA, which was performed through a refined modeling approach using the USEPA/AMS Regulatory Model (AERMOD), apply to both the Project and the Project with the East Site Hotel Option. The findings show that the Project and the Project with the East Site Hotel Option, with incorporation of Mitigation Measure AQ-MM-1 (refer to AQ-MM-1 in Threshold (b)) would result in cancer risk below 10 in one million for the maximum

136 SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, August 2003.

137 Impacts from asbestos and lead-based paint from demolition are expected to be less than significant. For additional details, refer to Section IV.F, *Hazards and Hazardous Materials,* of this Draft EIR.

impacted residential and worker receptors. The maximum non-cancer impacts for the Project and Project with the East Site Hotel Option would be below a hazard index of 1.0. The results of this refined AERMOD dispersion modeling provides further substantial evidence that TAC emissions from construction activities would not expose sensitive receptors to substantial TAC concentrations.[138] **Thus, although this analysis is provided for informational purposes only, it demonstrates that construction activities under the Project or the Project with the East Site Hotel Option with incorporation of AQ-MM-1 would not expose sensitive receptors to substantial TAC concentrations.**

(ii) Operational Impacts

The SCAQMD recommends that operational health risk assessments be conducted for substantial sources of operational DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions.[139] Project operation would generate only minor amounts of diesel emissions from mobile sources, such as delivery trucks and occasional maintenance activities that would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. Furthermore, Project trucks would be required to comply with the applicable provisions of the CARB 13 CCR, Section 2025 (Truck and Bus regulation) to minimize and reduce PM and NO_X emissions from existing diesel trucks. Therefore, Project operation would not be considered a substantial source of DPM.

In addition, Project operation would only result in minimal emissions of TACs from maintenance or other ongoing activities, such as from the re-application of architectural coatings and other products. Area sources that would generate TAC emissions include charbroiling activities associated with the restaurant uses and consumer products associated with re-applying architectural coatings and cleaning building surfaces. Charbroiling has the potential to generate small amounts of chemicals that are known or suspected by the State to cause human health impacts. However, restaurants incorporating charbroiling in the Air Basin would be required to comply with SCAQMD Rule 1138 (Control of Emissions from Restaurant Operations), which requires the installation of emissions controls on charbroilers. The emissions controls would minimize the already small amounts of TAC emissions associated with charbroiling (as seen in Tables IV.B-6 through IV.B-8) by approximately 83 percent,[140] such that charbroiling would not cause or contribute to adverse health impacts at nearby sensitive receptors. The emergency generators would be required to comply with SCAQMD Rule 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines), the purpose of which is to control and limit emissions of TACs from

138 CAPCOA, California Emissions Estimator Model Appendix: Appendix D: Default Data Tables, September 2016, p. D-77.

139 SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, August 2003.

140 USEPA, Methods for Developing a National Emission Inventory for Commercial Cooking Processes: Technical Memorandum, 2003.

emergency generators and similar equipment. In accordance with Rule 1470, emissions from maintenance and testing would not occur daily, but rather periodically, up to 50 hours per year. Furthermore, the emergency generators would be certified to the most stringent CARB and SCAQMD Rule 1470 standards and minimize emissions to the lowest technically feasible and regulatory required level for equipment of this size and type. As shown in Tables IV.B-6 through IV.B-8, PM10 and PM2.5 emissions (i.e., DPM emissions) from the emergency generators would be approximately 0.1 pounds per day for only those periodic days in which maintenance and testing would occur. Compliance with Rule 1470 would ensure the TAC emissions from the emergency generators would not cause or contribute to adverse health impacts at nearby sensitive receptors. Therefore, the emissions would not pose a health risk to off-site receptors.

With respect to the use of consumer products and architectural coatings, the residential and retail uses associated with the Project and the residential, retail, and hotel uses associated with the Project with the East Site Hotel Option would be expected to generate minimal emissions from these sources. The Project's land uses would not include installation of industrial-sized paint booths or require extensive use of commercial or household cleaning products. As a result, toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the uses expected on the Project Site, potential long-term operational impacts associated with the release of TACs would be minimal, regulated, and controlled, and would not be expected to exceed the SCAQMD thresholds of significance. Therefore, impacts would be less than significant. **Thus, operation of the Project or the Project with the East Site Hotel Option would not expose sensitive receptors to substantial TAC concentrations, and operational impacts would be less than significant.**

(2) Mitigation Measures

Impacts regarding the exposure of substantial pollutant concentrations on sensitive receptors during construction and operation were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding the exposure of substantial pollutant concentrations on sensitive receptors during construction and operation were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (d): Would the Project result in other emissions (such as those leading to odors) affecting a substantial number of people?

Although the East Senior Building under the Project with the East Site Hotel Option would be two floors shorter than under the Project, construction would require the same construction equipment as the Project. During operation, the Project and the Project with

the East Site Hotel Option would result in the same type of pollutants and emissions that are typical of similar mixed-use developments. Accordingly, Project-related emissions leading to odor impacts would be essentially the same under the Project or the Project with the East Site Hotel Option. Preparation of the analyses for the previous thresholds identified all applicable emissions other than odors that are pertinent to the Project and Project with the East Site Hotel Option impacts, which are attainment pollutants of CO, SO_2. Thus, the conclusions regarding the construction and operation impact analysis, and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

(1) Impact Analysis

(a) Construction

Potential activities that may emit other emissions, such as those leading to odors, during construction activities include the use of architectural coatings and solvents, as well as the combustion of diesel fuel in on- and off-road equipment. SCAQMD Rule 1113 would limit the amount of VOCs in architectural coatings and solvents. In addition, the Project would comply with the applicable provisions of the CARB Air Toxics Control Measure regarding idling limitations for diesel trucks. Through mandatory compliance with SCAQMD rules, no construction activities or materials are expected to result in other emissions, such as those leading to objectionable odors, affecting a substantial number of people. Furthermore, as shown in Table IV.B-5, construction emissions would not exceed the SCAQMD regional significance thresholds for attainment, maintenance, or unclassifiable criteria air pollutants (i.e., CO and SO_2). **Therefore, construction activities under the Project or the Project with the East Site Hotel Option would result in less-than-significant impacts with respect to other emissions, including those leading to odors.**

(b) Operations

According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project does not include any uses identified by the SCAQMD as being associated with substantial odors. As a result, the Project is not expected to discharge contaminants into the air in quantities that would cause a nuisance, injury, or annoyance to the public or property pursuant to SCAQMD Rule 402. Furthermore, as shown in Table IV.B-6, Table IV.B-7, and Table IV.B-8, operational emissions would not exceed the SCAQMD regional significance thresholds for attainment, maintenance, or unclassifiable criteria air pollutants (i.e., CO and SO_2). **Therefore, operation of the Project or the Project with the East Site Hotel Option would result in less-than-significant impacts with respect to other emissions, including those leading to odors.**

(2) Mitigation Measures

Impacts regarding other construction and operations-related emissions, such as those leading to odors were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding other construction and operations-related emissions, such as those leading to odors were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

Based on the established methodology to analyze cumulative impacts, project-level impacts are considered when determining cumulative impacts, as detailed below. The Project's consistency with applicable air quality plans would be similar under the Project and the Project with the East Site Hotel Option. Accordingly, cumulative impact significance findings presented below are applicable to the Project and the Project with the East Site Hotel Option.

(1) Impact Analysis

The City has identified a number of related projects located in the Project area that are currently proposed, have not yet been built, or that are currently under construction. Since both the timing and the sequencing of the construction of the related projects are unknown, any quantitative analysis to ascertain daily construction emissions that assumes multiple, concurrent construction projects would be speculative. For this reason, the SCAQMD's recommended methodology for assessing a project's cumulative impacts differs from the cumulative impacts methodology employed elsewhere in this Draft EIR. The SCAQMD recommends using two different methodologies: (1) that project-specific air quality impacts be used to determine the project's potential cumulative impacts to regional air quality;[141] or (2) that a project's consistency with the current AQMP be used to determine its potential cumulative impacts.

As stated in the 2006 L.A. CEQA Thresholds Guide, the "City of Los Angeles has not adopted specific Citywide significance thresholds for air quality impacts. However, because of the SCAQMD's regulatory role in the Air Basin, the 2006 L.A. CEQA Thresholds Guide references the screening criteria, significance thresholds and analysis methodologies in the CEQA Air Quality Handbook to assist in evaluating projects

141 SCAQMD, Potential Control Strategies to Address Cumulative Impacts from Air Pollution White Paper, Appendix D, 1993, p. D-3.

proposed within the City."[142] The SCAQMD CEQA Air Quality Handbook states that the "Handbook is intended to provide local governments, project proponents, and consultants who prepare environmental documents with guidance for analyzing and mitigating air quality impacts of projects."[143] The SCAQMD CEQA Air Quality Handbook also states that "[f]rom an air quality perspective, the impact of a project is determined by examining the types and levels of emissions generated by the project and its impact on factors that affect air quality. As such, projects should be evaluated in terms of air pollution thresholds established by the District."[144] The SCAQMD has also provided guidance on an acceptable approach to addressing the cumulative impacts issue for air quality as discussed below:[145]

> *"As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR… Projects that exceed the Project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."*

The City has determined to rely on thresholds established by the SCAQMD (refer to State CEQA Guidelines Section 15064.7) to assess the Project's cumulative impacts. While it may be possible to add emissions from the list of related projects with the Project, it would not provide meaningful data for evaluating cumulative impacts under CEQA because neither the City nor the SCAQMD have established numerical thresholds applicable to the summation of multiple project emissions for comparison purposes. Additionally, regional emissions from a project have the potential to affect the Air Basin as a whole, and, unlike other environmental issues areas, such as aesthetics or noise, it is not possible to establish a geographical radius from a specific project site where potential cumulative impacts from regional emissions would be limited. Meteorological factors, such as wind, can disperse pollutants, often times tens of miles downwind from a project site. Therefore, consistent with accepted and established SCAQMD cumulative impact evaluation methodologies, the potential for the Project to result in cumulative impacts from regional emissions is assessed based on the SCAQMD thresholds.

(a) Project-Specific Impacts

Construction and operation of the Project and Project with the East Site Hotel Option would result in the emission of criteria pollutants, including ozone precursor emissions, for which the region is in non-attainment (i.e., O_3, PM10 and PM2.5). Based on the Project-specific level of emissions, cumulative impacts would be potentially significant for construction and operation because regional NO_X emissions would exceed the threshold

142 City of Los Angeles, 2006 L.A. CEQA Thresholds Guide, 2006, p. B-1.
143 SCAQMD, CEQA Air Quality Handbook, April 1993, p. iii.
144 SCAQMD, CEQA Air Quality Handbook, April 1993, p. 6-1.
145 SCAQMD, Cumulative Impacts White Paper, Appendix D.

of significance, as shown in Table IV.B-5 and Table IV.B-8. Therefore, Mitigation Measures AQ-MM-1 and AQ-MM-2 are required, as discussed above.

With implementation of the required mitigation measures, regional emissions from the construction and operation of the Project and the Project with the East Site Hotel Option operations would be reduced to below the SCAQMD regional threshold for NO_X. Related projects would also be required under CEQA to incorporate mitigation measures if related project regional or localized emissions exceed the SCAQMD thresholds. **Therefore, the Project and the Project with the East Site Hotel Option's contribution to cumulative impacts related to regional NO_X construction and operational emissions would not be cumulatively considerable. Cumulative impacts would be less than significant after implementation of Mitigation Measures AQ-MM-1 and AQ-MM-2.**

Regional construction and localized construction and operational emissions would be below the SCAQMD regional and localized thresholds. **Therefore, the Project and the Project with the East Site Hotel Option's contribution to cumulative impacts related to regional construction and localized construction and operational emissions would not be cumulatively considerable. Cumulative impacts would be less than significant after mitigation (for regional emissions during operation).**

(b) Consistency with Air Quality Management Plan

The SCAQMD recommends assessing a project's cumulative impacts based on whether the project is consistent with the current AQMP. CEQA Guidelines Section 15064(h)(3) provides guidance in determining the significance of cumulative impacts. Specifically, CEQA Guidelines Section 15064(h)(3) states in part that:

> *"A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem (e.g., water quality control plan, air quality plan, integrated waste management plan) within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency…"*

For purposes of the cumulative air quality analysis with respect to CEQA Guidelines Section 15064(h)(3), the Project's and the Project with the East Site Hotel Option's cumulative air quality impacts are determined not to be significant based on its consistency with the SCAQMD's adopted 2016 AQMP, as discussed above. As is also discussed above, the Project's increase in population, housing, and employment would also be consistent with the 2016-2040 RTP/SCS growth projections, upon which the 2016 AQMP is based. Related projects would also be required to assess consistency with 2016 AQMP transportation control strategies, as well as with population, housing, and

employment growth projections in the 2016-2040 RTP/SCS and provide mitigation measures if significant impacts are identified. **As such, the Project would be consistent with and would not conflict with or obstruct implementation of the 2016 AQMP. Therefore, the Project's contribution to cumulative impacts with respect to AQMP consistency would not be cumulatively considerable. Cumulative impacts would be less than significant.**

(2) Mitigation Measures

Refer to Mitigation Measures AQ-MM-1 and AQ-MM-2 to reduce cumulative regional NO_X emissions. No additional mitigation measures are required.

(3) Level of Significance after Mitigation

Cumulative air quality impacts would be less than significant with mitigation. When considered together with related projects, air quality impacts would not result in a cumulatively considerable impact after mitigation.

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IV. Environmental Impact Analysis

C. Cultural Resources

1. Introduction

This section evaluates potential impacts on cultural resources (including archaeological and historical resources) that could result from implementation of the Project. The analysis is based on a Historical Resources Technical Report prepared by Historic Resources Group (HRG Report) dated March 2020, and a Phase I Cultural Resources Assessment Report prepared by ESA dated January 2019. These reports are included as Appendix F-1 and Appendix F-2 of this Draft EIR, respectively.

2. Environmental Setting

a) Regulatory Framework

Numerous laws and regulations require federal, State, and local agencies to consider the effects a project may have on cultural resources. These laws and regulations stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and prescribe the relationship among other involved agencies.

(1) Historical Architectural and Archaeological Resources

Historic and archaeological resources are governed by federal, State, and local (i.e., City of Los Angeles) regulations that provide the framework for the identification and protection of these resources. The National Historic Preservation Act (NHPA) and the California Environmental Quality Act (CEQA) are the primary regulations governing historic and archaeological resources in California. Regulations governing historic resources are also applicable to archaeological resources, since the latter are also considered historic resources. Regulations applicable to historic and archaeological resources are discussed below.

(a) Federal

(i) National Historic Preservation Act

The principal federal law addressing historic properties is the National Historic Preservation Act (NHPA), as amended,[1] and its implementing regulations.[2] The term "historic properties" refers to "any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register".[3]

(ii) National Register of Historic Places

The National Register of Historic Places (National Register) was established by the NHPA of 1966, as "an authoritative guide to be used by federal, State, and local governments, private groups and citizens to identify the Nation's historic resources and to indicate what properties should be considered for protection from destruction or impairment"[4,5] The National Register recognizes a broad range of cultural resources that are significant at the national, State, and local levels and can include districts, buildings, structures, objects, prehistoric archaeological sites, historic-period archaeological sites, traditional cultural properties, and cultural landscapes.

(a) Criteria

To be eligible for listing in the National Register, a property must be significant in American history, architecture, archaeology, engineering, or culture. Properties of potential significance must meet one or more of the following four established criteria:

A. Are associated with events that have made a significant contribution to the broad patterns of our history;

B. Are associated with the lives of persons significant in our past;

C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

1 54 United States Code of Laws [USC] 300101 et seq.

2 36 Code of Federal Regulations (CFR) Part 800

3 36 CFR Part 800.16(l)(1)

4 U.S. Department of the Interior, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation*, National Park Service, Washington, D.C., 1997, pp. 7 and 8.

5 U.S. Department of the Interior, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation,* National Park Service, Washington, D.C, 1997, pp. 7 and 8.

D. Have yielded, or may be likely to yield, information important in prehistory or history.

(b) Context

To be eligible for listing in the National Register, a property must be significant within a historic context. National Register Bulletin #15 states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are "those patterns, themes, or trends in history by which a specific...property or site is understood and its meaning...is made clear."[6] A property must represent an important aspect of the area's history or prehistory and possess the requisite integrity to qualify for the National Register.

(c) Integrity

In addition to meeting one or more of the criteria of significance, a property must have integrity. Integrity is defined as "the ability of a property to convey its significance".[7] The National Register recognizes seven qualities that, in various combinations, define integrity. The seven factors that define integrity are location, design, setting, materials, workmanship, feeling, and association. To retain historic integrity a property must possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance.

(d) Criteria Considerations

Certain types of properties, including religious properties, moved properties, birthplaces or graves, cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years are not considered eligible for the National Register unless they meet one of the seven categories of Criteria Consideration A through G, in addition to meeting at least one of the four significance criteria discussed above, and possess integrity as defined above.[8] Criteria Consideration G states that "a property achieving significance within the last 50 years is eligible if it is of exceptional importance". This is intended to prevent the listing of properties for which insufficient time may have passed to allow the proper evaluation of its historical importance.[9]

6 U.S. Department of the Interior, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation*, National Park Service, Washington, D.C, 1997, pp. 7 and 8.

7 U.S. Department of the Interior, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation*, National Park Service, Washington, D.C., 2002, p. 44.

8 U.S. Department of the Interior, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation*, National Park Service, Washington, D.C., 2002, p. 25.

9 U.S. Department of the Interior, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation*, 1997, p. 41.

(b) State

(i) California Environmental Quality Act

CEQA is the principal statute governing environmental review of projects occurring in the state and is codified at Public Resources Code (PRC) Section 21000 et seq. CEQA requires lead agencies to determine if a proposed project would have a significant effect on the environment, including significant effects on historical or unique archaeological resources. Under PRC Section 21084.1, a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.

The CEQA Guidelines (Title 14 California Code of Regulations [CCR] Section 15064.5) recognize that historical resources include: (1) a resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (California Register); (2) a resource included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and (3) 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 by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record. The fact that a resource does not meet the three criteria outlined above does not preclude the lead agency from determining that the resource may be a historical resource as defined in PRC Section 5020.1(j) or 5024.1.

If a lead agency determines that an archaeological site is a historical resource, the provisions of PRC Section 21084.1 and CEQA Guidelines Section 15064.5 apply. If an archaeological site does not meet the criteria for a historical resource contained in the CEQA Guidelines, then the site may be treated in accordance with the provisions of PRC Section 21083, which is as a unique archaeological resource. As defined in PRC Section 21083.2 a "unique" archaeological resource is an archaeological artifact, object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information;

2. Has a special and particular quality such as being the oldest of its type or the best available example of its type; or,

3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

If an archaeological site meets the criteria for a unique archaeological resource as defined in PRC Section 21083.2, then the site is to be treated in accordance with the provisions of PRC Section 21083.2, which state that if the lead agency determines that a project would have a significant effect on unique archaeological resources, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place (PRC Section 21083.1(a)). If preservation in place is not feasible, mitigation measures shall be required. The CEQA Guidelines note that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment (CEQA Guidelines Section 15064.5(c)(4)).

A significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). Substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired" (CEQA Guidelines Section 15064.5(b)(1)). According to CEQA Guidelines Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or

B. Account for its inclusion in a local register of historical resources pursuant to PRC Section 5020.1(k) or its identification in a historical resources survey meeting the requirements of PRC Section 5024.1(g), unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

C. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a Lead Agency for purposes of CEQA.

In general, a project that complies with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (Standards) or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Guidelines) shall be considered to have mitigated its impacts to historical resources to a less-than-significant level (CEQA Guidelines Section 15064.5(b)(3)). Both Secretary of the Interior Standards were codified in the Federal Register in 1995. The Standards and Guidelines are a series of concepts about maintaining, repairing, and replacing historic materials, as well as

designing new additions or making alterations.[10] The Standards comprise four different treatment approaches— preservation, rehabilitation, restoration, and reconstruction—each with their own set of standards (ranging from six to ten standards). Depending on the project, either preservation, rehabilitation, restoration, reconstruction, or a combination of the above may be required to mitigate a project under CEQA. The Standards for Rehabilitation are applicable to most rehabilitation and adaptive reuse projects involving continuation of existing use or changes in use. Standards 1 through 7 govern the use, repair and preservation of historic properties. Standard 8 is for significant archaeological resources. Standard 9 governs new additions, exterior alterations, or related new construction, and requires that the new work be differentiated from the old, and that it shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment. Standard 10 governs new additions and adjacent or related new construction and requires that new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

(ii) California Register of Historical Resources

The California Register is "an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Section 5024.1[a]). The criteria for eligibility for the California Register are based upon National Register criteria (PRC Section 5024.1[b]). Certain resources are determined by the statute to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register.

To be eligible for the California Register, a prehistoric or historic-period property must be significant at the federal, state, and/or local level under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

2. Is associated with the lives of persons important in our past;

3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

[10] U.S. Department of the Interior National Park Service – Technical Preservation Services, *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings*, 2017, p. 2.

4. Has yielded, or may be likely to yield, information important in prehistory or history.

A resource eligible for the California Register must meet one of the criteria of significance described above and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.

Additionally, the California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register and those formally determined eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and
- Those California Points of Historical Interest that have been evaluated by the OHP and have been recommended to the State Historical Commission for inclusion on the California Register.

Other resources that may be nominated to the California Register include:

- Historical resources with a significance rating of Category 3 through 5 (those properties identified as eligible for listing in the National Register, the California Register, and/or a local jurisdiction register);
- Individual historical resources;
- Historical resources contributing to historic districts; and
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

(iii) California Health and Safety Code Section 7050.5

California Health and Safety Code Section 7050.5 requires that in the event human remains are discovered, the County Coroner be contacted to determine the nature of the remains. In the event the remains are determined to be Native American in origin, the Coroner is required to contact the Native American Heritage Commission (NAHC) within 24 hours to relinquish jurisdiction.

(iv) Public Resources Code Section 5097.98

PRC Section 5097.98, as amended by Assembly Bill (AB) 2641, provides procedures in the event human remains of Native American origin are discovered during project implementation. PRC Section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further activities take into account the possibility of multiple burials. PRC Section 5097.98 further requires the NAHC, upon notification by a County Coroner, designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. Once the MLD has been granted access to the site by the landowner and has inspected the discovery, the MLD has 48 hours to provide recommendations to the landowner for the treatment of the human remains and any associated grave goods.

In the event that no descendant is identified or the descendant fails to make a recommendation for disposition, or if the landowner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject to further disturbance.

(c) Local

(i) City of Los Angeles General Plan Conservation Element

The City of Los Angeles General Plan Conservation Element [Resources], in Section 3, Archaeological and Paleontological Resources, states as its objective: "Protect the City's archaeological and paleontological resources for historical, cultural, research, and/or educational purposes" by continuing "to identify and protect significant archaeological and paleontological resources known to exist or that are identified during land development, demolition, or property modification activities." The implementing policy for this objective state that the City will:

> *…continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities.*[11]

The Conservation Element states that the applicant may be required to secure the services of a *bona fide* archaeologist to monitor excavations or other subsurface activities associated with a development project in which all or a portion is deemed to be of archaeological significance. Discovery of archaeological materials may temporarily halt the project until the site has been assessed, potential impacts

[11] City of Los Angeles, Conservation Element of the City of Los Angeles General Plan, City Plan Case No. 2001-0413-GPA, Council File No. 01-1094, 2001, pp. II-5 and II-6.

evaluated and, if deemed appropriate, the resources protected, documented and/or removed.

(ii) Local Designations

(a) Los Angeles Cultural Heritage Ordinance

In addition to the National Register and the California Register, two additional types of historic designations may apply at a local level, including designation of a Historic-Cultural Monument (HCM) and classification of an Historic Preservation Overlay Zone (HPOZ). Of these, the designation of an HCM is relevant to this Project and is discussed below.

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962 and amended it in 2007 (Los Angeles Administrative Code, Chapter 9, Division 22, Article 1, Section 22.171.7). The Cultural Heritage Ordinance was revised in 2018 (Ordinance No. 185472, amending Section 22.171 of Article 1, Chapter 9, Division 22 of the Los Angeles Administrative Code).[12] The Cultural Heritage Ordinance establishes criteria for designating a local historical resource as an HCM. According to the Cultural Heritage Ordinance, an HCM is any site (including significant trees or other plant life located on the site), building, or structure of particular historic or cultural significance to the City. HCMs are regulated by the City's Cultural Heritage Commission and the City Council.

The Cultural Heritage Ordinance states that a Historic-Cultural Monument designation is reserved for those resources that have a special aesthetic, architectural, or engineering interest or value of a historic nature and meet one of the criteria that follows:

1. [It] is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community;

2. [It] is associated with the lives of historic personages important to national, state, city, or local history; or

3. [It] embodies the distinctive characteristics of a style, type, period or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.13

Designation recognizes the unique architectural value of certain structures and helps to protect their distinctive qualities. Any interested individual or group may

12 City of Los Angeles, Office of Historic Resources, Cultural Heritage No. 185472, 2018, p. 1.

13 City of Los Angeles Department of City Planning, Office of Historic Resources, "What Makes a Resource Historically Significant?" 2009, https://preservation.lacity.org/commission/what-makes-resource-historically-significant, accessed January 14, 2019.

submit nominations for HCM status. Buildings may be eligible for HCM status if they retain their historic design and materials. Those that are intact examples of past architectural styles or that have historic associations may meet the criteria listed in the Cultural Heritage Ordinance.

The Los Angeles Cultural Heritage Ordinance provides that compliance with the Standards is part of the process for review and approval by the Cultural Heritage Commission of proposed alterations to HCMs (see Los Angeles Administrative Code Section 22.171.14.a.1). Therefore, the Standards are used for regulatory approvals for designated resources but not for resource evaluations.

(b) Los Angeles Municipal Code Section 91.106.4.5 (Permits for Historical and Cultural Buildings)

In addition, Los Angeles Municipal Code (LAMC) Section 91.106.4, which deals with permits, contains a provision for permits for historical and cultural buildings. This subsection states Los Angeles Department of Building and Safety Department (LADBS) "shall not issue a permit to demolish, alter or remove a building or structure of historical, archaeological or architectural consequence if such building or structure has been officially designated, or has been determined by state or federal action to be eligible for designation, on the National Register of Historic Places, or has been included on the City of Los Angeles list of Historic-Cultural monuments, without the department having first determined whether the demolition, alteration or removal may result in the loss of or serious damage to a significant historical or cultural asset." Furthermore, pursuant to LAMC Section 91.106.4.5.1, LADBS "shall not issue a building permit for demolition of a building or structure for which the original building permit was issued more than 45 years prior to the date of submittal of the application for demolition pre-inspection, or where information submitted with the application indicates that the building or structure is more than 45 years old based on the date the application is submitted," without having first provided the required notice and taken the required actions at least 30 days prior to issuance of the demolition of building or structure permit. The required notice involves the department sending written notice of the demolition pre-inspection application via U.S. mail to the abutting property owners and occupants, as well as the Council District Office and Certified Neighborhood Council Office representing the site, for which a demolition pre-inspection has been proposed for a building or structure.

Additionally, any interested individual may apply for a proposed designation of a Historic Cultural Monument. Upon the determination by the Planning Director that the application is complete—or upon initiation by City Council, Cultural Heritage Commission, or Planning Director—no permit for the demolition substantial alteration, or removal shall be issued. The site, building, or structure, regardless of whether a permit exits, shall not be demolished, pending final determination by the Commission and City Council whether the proposed site, building, or object or

structure shall be designated a Historic-Cultural Monument, pursuant to Cultural Heritage Ordinance No. 185472, amending Section 22.171 of the Los Angeles Administrative Code. Also, if the property has been previously identified in a survey or has been nominated for designation and it is determined by the City that a project is subject to CEQA review, the City may require preparation of a historical resources assessment report and CEQA impacts analysis, pursuant to CEQA Guidelines Section 15064.5, prior to issuance of a demolition permit. Once the process pursuant to LAMC Section 91.106.4.5.1 is completed, the LADBS will then be able to issue the applicable permits.

b) Existing Conditions

The following Existing Conditions is summarized from the Phase I Cultural Resources Assessment Report prepared by ESA and dated January 2019, which contains additional existing conditions detail.

(1) Prehistoric Setting

The earliest evidence of occupation in the Los Angeles area dates to at least 9,000 years before present (B.P.) and is associated with a period known as the Millingstone Cultural Horizon.[14,15]Departing from the subsistence strategies of their nomadic big-game hunting predecessors, Millingstone populations established more permanent settlements. These settlements were located primarily on the coast and in the vicinity of estuaries, lagoons, lakes, streams, and marshes where a variety of resources including seeds, fish, shellfish, small mammals, and birds were exploited. Early Millingstone occupations are typically identified by the presence of handstones (manos) and millingstones (metates), while those Millingstone occupations dating later than 5,000 years B.P. contain a mortar and pestle complex as well, signifying the exploitation of acorns in the region.

Although many aspects of Millingstone culture persisted, by 3,500 years B.P. a number of socioeconomic changes occurred.[16],[17],[18] These changes are associated with the period known as the Intermediate Horizon.[19] Increased

[14] E.J. Wallace, "A Suggested Chronology for Southern California Coastal Archaeology," *Southwestern Journal of Anthropology,* 1995, 11(3), pp. 214-230.

[15] C.N. Warren, "Cultural Traditions and Ecological Adaptation on the Southern California Coast," in *Archaic Prehistory in the United States*, edited by Cynthia Irwin-Williams, Eastern New Mexico University Contributions in Anthropology, 1968, 1(3), pp. 1-14.

[16] Jon M. Erlandson, *Early Hunter-Gatherers of the California Coast* (New York: Plenum Press, 1994), pp. 45-46.

[17] E.J. Wallace, "A Suggested Chronology for Southern California Coastal Archaeology," *Southwestern Journal of Anthropology,* 1995, 11(3), pp. 214-230.

[18] C.N. Warren, "Cultural Traditions and Ecological Adaptation on the Southern California Coast," in *Archaic Prehistory in the United States*, edited by Cynthia Irwin-Williams, Eastern New Mexico University Contributions in Anthropology, 1968, 1(3), pp. 1-14.

[19] E.J. Wallace, "A Suggested Chronology for Southern California Coastal Archaeology," *Southwestern Journal of Anthropology* 11(3), pp. 214-230

populations in the region necessitated the intensification of existing terrestrial and marine resources.[20] The Intermediate Horizon marks a period in which specialization in labor emerged, trading networks became an increasingly important means by which both utilitarian and non-utilitarian materials were acquired, and travel routes were extended. Archaeological evidence suggests that the margins of numerous rivers, marshes, and swamps within the Los Angeles River Drainage served as ideal locations for prehistoric settlement during this period. These well-watered areas contained a rich collection of resources and are likely to have been among the more heavily trafficked travel routes.

The Late Prehistoric period, spanning from approximately 1,500 years B.P. to the mission era, is the period associated with the florescence of the contemporary Native American group known as the *Gabrielino.*[21] Occupying the southern Channel Islands and adjacent mainland areas of Los Angeles and Orange Counties, maps produced by early explorers indicate that at least 26 *Gabrielino* villages were within proximity to known Los Angeles River courses, while an additional 18 villages were reasonably close to the river.[22]

(2) Ethnographic Setting

The Project Site is located in a region traditionally occupied by the Takic-speaking Gabrielino Indians. The term "Gabrielino" is a general term that refers to those Native Americans who were administered by the Spanish at the Mission San Gabriel Arcángel. Prior to European colonization, the Gabrielino occupied a diverse area that included: the watersheds of the Los Angeles, San Gabriel, and Santa Ana rivers; the Los Angeles basin; and the islands of San Clemente, San Nicolas, and Santa Catalina.[23] The Gabrielino were hunter-gatherers who lived in permanent communities located near the presence of a stable food supply. Subsistence consisted of hunting, fishing, and gathering.

There were possibly more than 100 mainland villages and Spanish reports suggest that village populations ranged from 50 to 200 people.[24] Prior to actual Spanish contact, the Gabrielino population had been decimated by diseases, probably spread by early Spanish maritime explorers. The Gabrielino are estimated to have

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20 Jon M. Erlandson, *Early Hunter-Gatherers of the California Coast* (New York: Plenum Press, 1994), pp. 6 and 276.

21 E.J. Wallace, "A Suggested Chronology for Southern California Coastal Archaeology," *Southwestern Journal of Anthropology* 11(3), pp. 214-230.

22 Blake Gumprecht, *Los Angeles River: Its Life, and Possible Rebirth* (Baltimore: The Johns Hopkins University Press, 2001), p. 26.

23 A.L. Kroeber, *Handbook of the Indians of California* (New York: Dover Publications, Inc., 1925, reprinted 1976), p. 620.

24 Lowell J. Bean, and Charles R. Smith, "Gabrielino, in California," in *Handbook of North American Indians*, Vol. 8, edited by R.F. Heizer and W. C. Sturtevant, general editor, (Washington, D.C., Smithsonian Institution, 1978), pp. 538-549.

had a population numbering around 5,000 in the pre-contact period.[25] Villages are reported to have been the most abundant in the San Fernando Valley, the Glendale Narrows area north of downtown Los Angeles, and around the Los Angeles River's coastal outlets.[26] A map of Gabrielino villages, based on documents from the Portola expedition in 1769 and other ethnographic records, indicates that the closest Gabrielino site to the Project Site is the village and sacred site of *Kawegna,* the source of the name for Cahuenga Boulevard. This site is located approximately three miles northwest of the Project Site in the general area of Toluca Lake and Universal City. The next closest village to the Project Site is the village of *Maungna,*[27] which was once situated at the current location of Rancho Los Feliz, about 3.5 miles northeast of the Project Site.

(3) Historical Setting

(a) Project Site

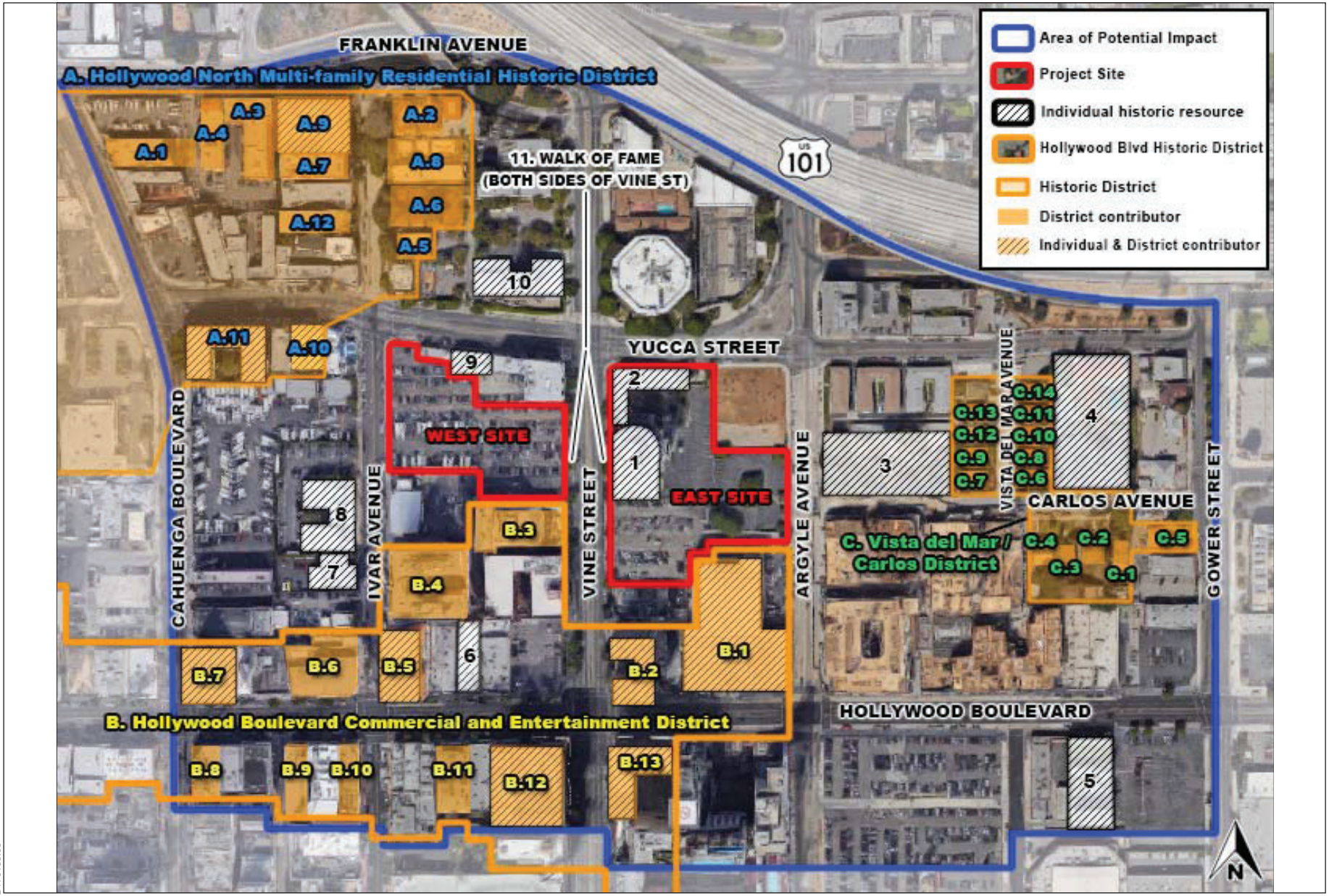
This section presents a summary of historical background for the development of Hollywood area in which the Project Site is located, as well as historical background of the more immediate area surrounding the Project Site as shown in **Figure IV.C-1,** *Potential Historical Resources on and in the Vicinity of the Project Site.* The historical background information is derived from is the HRG Report provided in Appendix F-1 of this Draft EIR.

The Project Site spans two city blocks and is comprised of 10 individual parcels located in the area of the City of Los Angeles known today as central Hollywood, and it is generally bounded by Yucca Street to the north, Argyle Avenue to the east, adjacent development and Hollywood Boulevard to the south, and Ivar Avenue to the west. The Project Site is bifurcated by Vine Street, which runs north/south. The portion of the Project Site located between Ivar Avenue and Vine Street is identified as the "West Site", and the portion located between Vine Street and Argyle Avenue is identified as the "East Site." The majority of the Project Site is a surface parking lot, and there are several existing improvements on the Project Site, and a segment of the Hollywood Walk of Fame is adjacent to the Project Site. The West Site contains a surface parking lot and an existing building currently occupied (leased) by the American Musical and Dramatic Academy (AMDA), located at 6334 W. Yucca Street. Built in 1978, it is a one-story building that was originally constructed for use as a vehicle sales office; two years later became a rental office for a car rental agency. It is currently used by the AMDA for the storage of sets and props.

25 A.L. Kroeber, *Handbook of the Indians of California* (New York: Dover Publications, Inc., 1925, reprinted 1976), p. 620.

26 Blake Gumprecht, *Los Angeles River: Its Life, and Possible Rebirth (*Baltimore: Johns Hopkins University Press, 1999), p. 31.

27 William, McCawley, *The First Angelinos: The Gabrielino Indians of Los Angeles* (Banning, CA: Malki Museum Press, 1996), p. 55.



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SOURCE: ESA, 2019; HRG, 2019

Hollywood Center Project

Figure IV.C-1
Potential Resources on and in the Vicinity of the Project Site

The East Site is currently occupied by the Capitol Records Complex comprised of the Capitol Records Building and the H.L. Gogerty Building (Gogerty Building) and a surface parking lot that serves the Capitol Records Complex and provides public parking. The Capitol Records Building is located at 1750 N. Vine, and it was built in 1956. It is 13 stories in height, reaching an above-grade height of 165 feet. It is located in the western portion of the East Site, fronting Vine Street. The Gogerty Building is located at 6272-6284 Yucca Street, and it was constructed in 1930. The two-story commercial building is commonly referred to as the "H.L. Gogerty Building" in honor of the architect responsible for its original design, and it is located just north of the Capitol Records Building at the southeast corner of Vine and Yucca streets on the East Site. The Hollywood Walk of Fame was designed by Southern Californian artist Oliver Weismuller in 1958, and is composed of sidewalks, with bronze stars set into it, that runs west along Hollywood Boulevard from Gower Avenue to La Brea Avenue and along Vine Street between Yucca Street and Sunset Boulevard. The Vine Street segment between Yucca Street and Hollywood Boulevard is located on both sides of Vine Street and is, therefore, within both the East Site and the West Site.

(b) Historic Overview of Hollywood's Development

It was not until the 19th century that development of Hollywood first began. Initially, it was a small agricultural community, with a freight rail line that was constructed in 1887-1888 that linked both Hollywood and the neighboring community of Colegrove to downtown Los Angeles. However, by the turn of the 20th century, the fields and orchards increasingly gave way to speculative real estate development.

(i) Early 20th-Century Development, 1900 - 1941

In 1900, the Cahuenga Valley Improvement Association was established to guide real estate development in the area, just as the first electric track down the length of Prospect Avenue (present day Hollywood Boulevard) was completed. In 1903, the City of Hollywood officially incorporated with a population of 700. In February of 1910, Hollywood was consolidated to the City of Los Angeles. Although consolidation spurred modest growth in the area, Hollywood remained a relatively distant and sleepy outpost of a more urbanized Los Angeles. The area remained low-density, with much of the land undeveloped until just after the first decade of the 20th Century.

Between 1915 and 1930, Hollywood entered a period of rapidly accelerated growth, during which the area was transformed from a pastoral residential and farming community to a bustling business, entertainment and residential zone. Although now formally part of the City of Los Angeles, Hollywood continued to maintain its own identity, which was tied directly to the growth of the motion picture industry that began to truly flourish in the 1920s. By this time, Hollywood was no longer a small independent city but a thriving suburb with a rapidly growing population and the home of a significant national industry. The name "Hollywood"

ultimately came to represent the motion picture industry as a whole and the publicity the industry generated gave the geographic location of Hollywood a special glamour. As the popularity of motion pictures grew, more physical facilities related to film production were constructed in Hollywood, and the industry contributed significantly to the area's overall industrial growth. From the 1910s through the boom of the 1920s and into the 1930s, Hollywood experienced tremendous population growth.

Hollywood reached its heyday in the 1920s, when a large number of movie studios, theaters, and shopping centers filled Hollywood and Sunset Boulevards between Vine Street and Highland Avenue. To accommodate the increased demand for housing as well as services and amenities, residential and commercial development in Hollywood increased dramatically. By the mid-1920s, Hollywood Boulevard had transformed into a tightly-developed commercial corridor with most blocks containing one- and two-story storefront buildings with taller, more impressive buildings located at corners. Housing in Hollywood dramatically increased in density to meet burgeoning demand. Bungalow courts, duplexes, and multi-story apartment buildings replaced many of the single-family homes and spacious gardens that had originally characterized the area.

In the mid-to-late 1930s, the glamorous image of Hollywood as a national fashion and entertainment destination began to fade, due in part to the effects of the Great Depression. During this era, Hollywood experienced little in the way of growth but much in the way of increased commercial activity in a manner that reinforced Hollywood's role as a hub between Los Angeles and adjacent communities.

(ii) World War II and Post-War Development, 1941-1960

The United States' entry into World War II commenced following the bombing of Pearl Harbor in December 1941. Wartime austerity had a dramatic impact on the landscape of Los Angeles, and Hollywood was no exception. Residential construction was halted for the duration of the war, and existing businesses and manufacturing operations were converted for the production and distribution of materials essential to the war effort. Following World War II, density, and the scale of development in Hollywood increased substantially.

However, by the 1950s, motion picture operations began to relocate to other areas, and the major industry in Hollywood shifted to tourism. During the early 1950s, the Hollywood Freeway (US-101) cut through the northeast part of Hollywood, and widespread automobile ownership coupled with the development of the freeway system pulled new development to previously outlying areas on the west side of Los Angeles and in the San Fernando Valley. Later in the decade, the famous Capitol Records Building was constructed at 1750 N. Vine Street and the Hollywood Walk of Fame was created on Hollywood Boulevard as a tribute to

actors, directors, and other contributors to the entertainment industry. Further information regarding these specific features is provided below.

(iii) Late-20th Century Development, 1960-2000

In the 1960s and 1970s Hollywood's population became more ethnically diverse, as new immigrant groups began settling in the area. Community and residential densities continued to increase, as original single-family homes, bungalow courts, and smaller apartment buildings were replaced with larger multi-family residential complexes. By the 1980s the Hollywood community was in a state of economic decline as commercial development became focused more intensely elsewhere in the City. The Community Redevelopment Agency of Los Angeles established the Hollywood Redevelopment Project Area in 1986 to encourage development in the area. Among the goals of the agency were to revitalize the historic core and preserve historically significant buildings. Towards the end of the 1990s, Hollywood began to experience a resurgence in development, and saw the increase in density and scale of that development that continues today.

(c) Historical Background of the Project Vicinity

(i) Early 20th-Century Development, 1900 - 1941

Early settlement and development in the vicinity of the Project Site during the late 19th and early 20th centuries was characterized by large blocks of planted fields, orchards, and scattered large single-family homes built by wealthy landowners, all traversed by unpaved streets. As development in Hollywood began to accelerate in the first decade of the 20th Century, Hollywood Boulevard located south of the Project Site, which was called Prospect Avenue until 1910, slowly developed as a residential street lined with stately homes. The West Site, however, remained largely undeveloped throughout the first decade of the 20th century.

Despite Hollywood being known in the early 20th century as the "City of Homes," the area also was marked by commercial development, and the intersection of Hollywood Boulevard and Cahuenga Boulevard (two blocks west of the Project Site) became an early Hollywood commercial center.

It was in the mid-1920s too, that theaters (both for legitimate stage productions and film exhibition) would concentrate in Hollywood. Important examples constructed in the vicinity of the Project Site include the Avalon Hollywood constructed in 1926 (see Figure IV.C-1; all future references to individual historic resources in this Draft EIR section refer to building footprints keyed into this figure), which was located on the west side of Ivar Avenue north of Hollywood Boulevard, and the Pantages Theatre (Map No. B.1), which was constructed in 1929 and located on the northwest corner of Hollywood Boulevard and Argyle Avenue.

By the end of the 1920s, another road improvement project, championed by the Hollywood Chamber of Commerce, was implemented for street upgrades in key

locations to move traffic more efficiently throughout Hollywood. Dubbed the "Five-Finger Plan," street improvements included widening, grading, and paving for key street locations with an emphasis on further developing Vine Street. The focus on increasing traffic to Vine Street via Yucca Street spurred development interest in extending the commercial core of Hollywood and Vine north to include Yucca. The most impressive project that was realized was a height-limit office tower (150 feet) today referred to as the Yucca-Vine Tower, built for Mountain States Life Insurance at the northwest corner of Yucca and Vine streets (No. 10). Constructed in 1928, the Art Deco building was designed by architects H.L. Gogerty and Carl Jules Weyl who had also been responsible for designing the Avalon Hollywood just south on Vine Street. Two modest commercial buildings, also designed by H.L. Gogerty in an Art Deco style, were developed near Yucca and Vine. These were a two-story commercial building (1930), today referred to as the "Gogerty Building," (No. 2) at the southeast corner of Yucca Street and Vine Street and a two-story commercial building constructed in 1932 on the south side of Yucca Street between Vine Street and Ivar Avenue (No. 7). By the time the second building on Yucca Street was open for business, however, the country was entering into an economic depression and Gogerty's early 1930s designs marked the end of commercial expansion to Yucca as development in Hollywood slowed to a crawl. The vicinity of the Project Site changed little during the 1930s as the economic contraction of the Great Depression severely limited development.

(ii) World War II and Post-War Development, 1941-1960

The country's mobilization for World War II during the 1940s effectively ended the Depression but diverted all available funds to the war effort. Instead of wholesale new development, property and business owners were largely focused on upgrading, modernizing and reusing their existing properties as needed to accommodate changing tenants and business needs. One noticeable trend was the conversion of vacant, underutilized or substandard properties to surface parking. As central Hollywood became increasingly commercial, and the automobile became the preferred mode of transportation, the parcels mid-block between Hollywood Boulevard and Yucca Street were gradually paved and used for surface parking. The opening of the US-101 in 1954 made central Hollywood more accessible to a wider population and the need for parking continued to grow.

Substantial new construction did not return to Hollywood until the mid-1950s, when a west coast headquarters building was constructed for Capitol Records (No. 1) on the east side of Vine Street mid-block between Hollywood Boulevard and Yucca Street, presently located within the East Site. Capitol Records was founded in 1942 as the first West Coast based record label. The building, described in greater detail below, was commissioned by British music conglomerate EMI after its acquisition of Capitol Records in 1955. Construction began in 1955 and was completed in April 1956. Designed shortly before the City's 150-foot height limit was lifted, the 13-

story building conforms to the City's height limit ordinance and it is topped by an antenna spire, giving the building and it an overall height of 220 feet to the tip of the spire.[28] Designed by Louis Naidorf then a young architect working for the firm of Welton Becket and Associates, the Capitol Records Building is considered the world's first circular office building. The blinking light atop the building spelled the word "Hollywood" in Morse code, and has done so since the building's opening. It was also the first large office building to be constructed in Hollywood in over two decades. The striking Mid-Century Modern design of the Capitol Records Building contrasted starkly with the pre-World War II commercial buildings in the immediate surrounding area and with its antenna spire it was one of the tallest structures in Hollywood at the time. Los Angeles' building height limit was repealed by voters in 1956 through a referendum, and overturned by the City in 1958 just two years after the Capitol Records Building was completed.[29]

(iii) Late-20th Century Development, 1960-2000

In 1958, the "Hollywood Walk of Fame" (No. 11) was designed by Southern Californian artist Oliver Weismuller with the intent that it would honor important entertainment industry figures, improve and beautify the Hollywood streets, and engage tourists. Official groundbreaking commenced in 1960. The Hollywood Walk of Fame is composed of sidewalks along Hollywood Boulevard from Gower Avenue to La Brea Avenue and along Vine Street between Yucca Street and Sunset Boulevard. The sidewalk's pavement is imbedded with over 2,000 five-pointed stars featuring the names of people commemorated for their contributions to the entertainment industry.

Hollywood's first post-height limit "skyscraper" was the 20-story Sunset and Vine Tower constructed at the southeast corner of Sunset and Vine in 1963. Rising over 290 feet in height, the Sunset and Vine Tower was almost twice the height of any height-limit era building in Hollywood. Designed in a Corporate Modern style, the rectangular steel-frame and glass curtain wall building presented a stark silhouette that radically altered the Hollywood skyline. Additional high-rises on Sunset soon followed including a 185-foot office building constructed in 1968 at the southwest corner of Sunset Boulevard and Cahuenga Boulevard, and a 22-story office tower constructed in 1971 at the northwest corner of Sunset and Argyle. In the Project Site area, additional buildings constructed during the 1960s, include the five-story office building at the southwest corner of the intersection of Vine and Yucca streets, and an office building at 1800 Argyle Avenue (now demolished). These

28 Council on Tall Buildings and Urban Habitat, "Capitol Records Building," in The Skyscraper Center: The Global Tall Building Database of the CTBUH, 2019, http://www.skyscrapercenter.com/building/capitol-records-building/15121, accessed February 7, 2019.

29 Julia Wick, "City Hall was L.A.'s Tallest Building for 4 Decades—By Law," laist, Arts & Entertainment category, April 27, 2016 12:00 AM, https://laist.com/2016/04/27/city_hall_tall.php, accessed February 7, 2019.

buildings would represent the last substantial developments in the Project Site area until the turn of the 21st century.

(d) Historical Resources Identified on the Project Site

There are two (2) previously identified potentially eligible historical resources recorded within the Project Site, both of which could be directly affected by the Project as the result of alteration to the immediate surroundings, as summarized in **Table IV.C-1**, *Summary of Identified Historical Resources on the Project Site*.

TABLE IV.C-1
SUMMARY OF IDENTIFIED HISTORICAL RESOURCES ON THE PROJECT SITE

No.	APN #	Address	Resource	Date Built	Listing Eligibility
1	5546030028	1750 N. Vine St.	Capitol Records Building	1956	HCM #857; determined eligible for the National Register by consensus; listed in the California Register
2	5546030032	6272-6284 Yucca St. (1770 N. Vine St.)	H.L. Gogerty Building	1930	Appears eligible for the California Register as an individual property through survey evaluation.

SOURCE: Historic Resources Group, Historic Resources Technical Report, March 2020. Provided in Appendix F-1 of this Draft EIR.

The locations of the buildings, as well as the surface parking lots on the Project Site are shown in Figure IV.C-1. A description of the two buildings on the Project Site, as well as the overall setting of the Project Site, are provided below. In addition, more detailed descriptions of the buildings, a more detailed description and photographs of the buildings are included in the HRG Report provided in Appendix F-1 of this Draft EIR.

(i) Capitol Records Building, No. 1

(a) Property History

The 13-story building was constructed in 1956 as the headquarters for Capitol Records, Inc. and is an excellent example of Mid-Century Modern architecture. Design of the building is credited to architect Louis Naidorf working in the office of noted Los Angeles architect Welton Beckett. One of the special features incorporated into the design of the building were reverberation chambers. The chambers were used to produce sound reverberation in order to add depth, texture and color to recorded music. These chambers represent a signature technical innovation that helped render the Capitol Records studios world famous and a highly desired location for recording.

(b) Exterior

The building consists of a circular tower rising from a broad rectangular base. The building's base and tower rise 150 feet in height. The building is capped by a concentric ring sign with block letters spelling out "CAPITOL RECORDS" and an 82-foot, perforated metal trylon. Fenestration consists of horizontal rows of windows separated by concrete structural piers. Concrete awnings encircle each tower floor. Porcelain-enamel sunshades extend from the concrete awnings. The ground-floor façade facing Vine Street is asymmetrically arranged with a recessed glazed storefront entry, integrated planters, and louvered screen. Important interior features include three recording studios on the ground floor and four underground reverberation chambers located beneath the associated (rear) surface parking lot.

(c) Alterations

In 2001, the adjacent Gogerty Building was attached to the Capitol Records Building with a one-story addition, in order to incorporate the Gogerty Building into the Capitol Records property. Other alterations include changes to the rear entrance. Otherwise, it does not appear that the building has sustained substantial alterations.

(d) Statement of Significance

The Capitol Records Building is architecturally significant as "an important example of Mid-Century Modern architecture, the world's first round office tower, and the first skyscraper built in Hollywood after World War II." In addition, the architectural firm responsible for its design, Welton Beckett and Associates, was a local architectural firm "important to the development of Los Angeles… responsible for innovative structures that successfully melded the Modern style with rational design principles, as exemplified in the Capitol Tower." The Capitol Records Building and its rooftop signage are historically significant for their association with Capitol Records, Inc., which is important as "the first major recording label on the West Coast and the site of pioneering recordings by artists such as Frank Sinatra and Nat King Cole."[30] The building has been determined eligible to the National Register through what is known as a "consensus determination" during the Section 106 process, which means that the property was previously reviewed by a federal agency under Section 106 of the National Historic Preservation Act. In order to move forward with the Section 106 process, the federal agency consulted with the California State Office of Historic Preservation in order to arrive at an agreement, also known as a consensus determination, as to the building's potential eligibility to the National Register. Once both parties agreed that it appeared eligible, the Section 106 process could move forward. However, a consensus determination does not result in formal listing of the property in the National Register; this may occur at a later time through a formal nomination process. A consensus

30 Recommendation Report Cultural Heritage Commission, for Case No; CHC-2006-3592-HCM, Los Angeles City Planning Department, August 17, 2006.

determination does result, however, in the property being automatically added to the California Register. As a building listed on the California Register and designated a City of Los Angeles HCM, the building is significant under California Register Criteria 1 and 3, and HCM Criteria 1 and 3.

(e) Character-Defining Features Analysis

The building is significant under California Register Criterion 3 for its architecture and character-defining features important to the building's architectural significance, which include:

- Rectangular, one-story base with central recessed entry plaza;
- 13-story building, consisting of a 12-story circular tower rising from a ground-level base;
- Top level roof deck and inset utility core clad with perforated metal trylon;
- Rooftop perforated metal trylon with a beacon light blinking "H-O-L-L-Y-W-O-O-D" in international Morse Code;
- Vertical concrete piers running the full height of the 13-story building;
- Horizontal bands of fixed windows set between the piers on each tower floor;
- Concrete awnings at each tower floor; and
- Porcelain-enamel sunshades ringing each tower floor.

Because the building was constructed for Capitol Records, Inc. and Capitol Records has continued to occupy the building up to the present day, features important to its significance under criteria C/3/3 are also important to its significance under criteria A/1/1 as the building's architecture has become associated with Capitol Records. Other features that further convey the building's association with Capitol Records, Inc. and the recording industry include the following:

- Rooftop concentric ring sign with block letters spelling out "CAPITOL RECORDS";
- Three recording ground floor studios; and
- Four underground reverberation chambers.

Setting features important to the historic significance of the Capitol Records Building are largely contained to the building parcel, as well as the configuration of street and sidewalk fronting the building's west-facing façade. The rear parking lot, original to the building, is less important as it is located at the back of the building, inaccessible to the public.

(ii) Gogerty Building, No. 2

(a) Property History

1770 Vine Street was constructed in 1930. It was designed in Art Deco style by noted local architect Henry L. Gogerty (1894-1990). As a partner with the firm of Gogerty and Weyl and after 1928 as the principal architect of his namesake firm H.L. Gogerty Associates, he was responsible for multiple commercial and institutional buildings throughout Southern California.

(b) Exterior

The building is irregular in plan with poured concrete cladding and a flat roof. Original features included a curved façade, recessed window and door openings, stepped entry surrounds, and vertical piers projecting above the roofline.

(c) Alterations

Originally constructed as a series of storefronts with office spaces above, the building has been substantially altered since its original construction. In 2001, the Gogerty Building was incorporated into the Capitol Records property and was attached to the Capitol Records Building with a one-story addition connecting the two buildings. It appears that this building improvement reconstructed much of the Gogerty Building while preserving the primary north- and west-facing façades. When viewed today, visible alterations include the replacement of original storefronts and windows in existing openings, removal of decorative reliefs, an addition to the eastern façade, and the above-mentioned south addition connecting to the Capitol Records Building.

(d) Architectural style

Although originally designed in Art Deco style, the Gogerty Building previously was subject to alterations, as described above, including a contemporary addition that connects it to the Capitol Records Building. Today, because of the extent of the alterations, the building's original architectural style is no longer clearly discernible as Art Deco although it retains some character-defining features of the style on its façades.

(e) Statement of Significance

As a building that currently is not listed on either the National Register or the California Register but appears eligible for the California Register as an individual property through survey evaluation, a formal statement of significance has not been developed for the building previously. A Hollywood Community Redevelopment Area survey evaluation form from a survey conducted in 2008 indicates that the applicable evaluation criteria are California Register Criteria 1 and 3. However, the form only discusses significance for architecture and as a building type (reflecting Criterion 3), stating that "the property appears significant both for its architecture and

as a fine example of commercial architecture constructed during the Depression." Significance under Criterion 1 is not discussed.

(f) Character-Defining Features Analysis

Character-defining architectural features of the Gogerty Building include:

- Public orientation to Yucca Street and Vine Street
- Two-story massing
- Curved, street-facing façade
- Recessed window and door openings
- Decorative stepped frames surrounding window and door openings
- Decorative vertical piers

Setting features important to the historic significance of the Gogerty Building are largely contained to the building parcel, as well as the configuration of street and sidewalk fronting the building's north- and west-facing façades. Parcels immediately south and east have been substantially altered since the Gogerty Building's original construction in 1930 and do not represent character-defining aspects of the building's setting.

(iii) Setting of Project Site

The East Site of the Project Site contains only two buildings, the Capitol Records Building and the Gogerty Building, as reviewed above; the remainder of the East Site is used as surface parking. The majority of the West Site also is used for surface parking, except for a small, single-story building located at the north end of the West Site that does not meet the 50-year threshold for evaluation and has not been surveyed previously. Further detail regarding the setting of the Project Site is provided in Chapter III, *Environmental Setting*, of this Draft EIR.

(e) Identified Historical Resources in the Project Vicinity

There are 25 previously identified potentially eligible historical resources—including two historic districts (Hollywood Boulevard Commercial and Entertainment District and the Vista del Mar/Carlos District), one potential historic district (Hollywood North Multi-Family Residential Historic District) and structure (Hollywood Walk of Fame)—recorded within the Project vicinity (an approximately 0.25-mile radius), which are described in greater detail in the HRG Report included in Appendix F-1, of this Draft EIR. The findings in the HRG Report were based on a records search at the South Central California Inventory Center, as well as consultation with the California Historical Resources Inventory and the findings of the City of Los Angeles' city-wide survey, SurveyLA.

Of the 25 previously identified historical resources, there are 21 previously identified individual historical resources that could be indirectly affected by the Project as the result of alteration to the immediate surroundings, as summarized in **Table IV.C-2**, *Summary of Identified Historical Resources in Project Vicinity*. Because they are near the Project Site, these resources could be indirectly impacted, if the Project would physically alter their contributing features and associated setting. For example, indirect impacts may occur if construction vibration would physically affect the structure or materials of adjacent historic resources. Alternatively, if existing improvements on the Project Site contribute to the historic setting of nearby historic resources, then new proximate construction on the Project Site could alter the character of the historic setting associated with the nearby resource. In accordance with the Secretary of the Interior's Standards, new additions, exterior alterations, or related new construction should not destroy historic materials that characterize a property. New construction should be differentiated from the old and compatible with the massing, size, scale, and architectural features of the historic property to avoid impacts to the historic integrity of the property and its environment. New additions and adjacent or related new construction should be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired. Descriptions of location and views of the Project Site from each property are provided. If the Project would be visible from an identified historical resource, or if the Project Site is physically adjacent to an identified resource, further analysis was conducted to determine if potential indirect impacts from the Project would occur that would substantially change the integrity of the historical resource such that its eligibility would be materially impaired. A direct view is defined as an unobstructed view of the Project Site from the front elevation of a historic building at ground level from the public right-of-way.

In addition, the locations of the National Register-listed district, the district previously determined eligible for listing in the National Register, and the potential historic district are shown in Figure IV.C-1 and individual resources in Table IV.C-2 are keyed into this map, as well. The individual contributing buildings and one structure (Hollywood Walk of Fame) that comprise these districts and potential district are described in more detail below. Four resources were identified that are physically adjacent to the Project Site: Pantages Theatre at 6233 Hollywood Blvd.; Art Deco Storefronts at 6316-24 Yucca St.; the Hollywood Walk of Fame, which is comprised of sidewalks located along Hollywood Boulevard from Gower Avenue to La Brea Avenue and along Vine Street between Yucca Street to the north and Sunset Boulevard to the south (portions of the sections running along both the east and west sides of Vine Street front the Project Site); and Avalon Hollywood at 1735 Vine St.

TABLE IV.C-2
SUMMARY OF IDENTIFIED HISTORICAL RESOURCES IN PROJECT VICINITY

Map No.	APN #	Address	Resource	Date Built	Listing Eligibility	Views of Project Site
Individually Listed in the National Register						
A.11	5546005001	6376 Yucca St.	Halifax Apartments	1923	Individual property listed in the National Register by the Keeper. Listed in the California Register. Appears eligible for listing in the California Register as a contributor to a California Register eligible district through survey evaluation. – Hollywood North Multi-Family Residential Historic District	Physically separated from the Project Site by other intervening buildings. Located over one block away, facing north and west. No direct views of Project Site to east are possible.
B.5	5546004011	6331 Hollywood Blvd.	Guaranty Building	1923	Listed in the National Register and California Register as an individual property. Contributor to a historic district listed in National Register by the Keeper. Listed in the California Register as a contributor to a historic district.	Street-facing facades oriented toward south and west, away from the Project Site. Over half block southwest of the Project Site, separated by other intervening buildings. No direct views of Project Site to north and northeast, are possible.

TABLE IV.C-2
SUMMARY OF IDENTIFIED HISTORICAL RESOURCES IN PROJECT VICINITY

Map No.	APN #	Address	Resource	Date Built	Listing Eligibility	Views of Project Site
Listed as a District in the National Register						
B	N/A	Hollywood Boulevard between Sycamore Avenue and Argyle Avenue, as well as portions of Vine Street, Ivar Avenue, and Highland Avenue.	Hollywood Boulevard Commercial and Entertainment District	**1915-1939**	Listed in the National Register and California Register.	Physically separated from the Project Site by other intervening buildings. Views of Project Site are limited.
Determined Eligible for Listing as a District in the National Register						
C	N/A	Vista del Mar Avenue and Carlos Avenue Between Vine Street and Gower Street	Vista del Mar/ Carlos District	1910-1924	Determined eligible for listing in the National Register. Listed in the California Register. District originally contained 16 contributors. Since then, one building has been demolished (6142-6144 Carlos Avenue) and the other has been substantially altered (1771 Vista del Mar).	Views looking west. District is one block away and separated from Project Site by Argyle Ave. No direct views of Project Site are possible.
Appears Individually Eligible for Listing in the National Register						
5	5546027002	6122 Hollywood Blvd.	Fonda Theatre/ Music Box Theatre	1926; 1936	Appears eligible for listing in the National Register as an individual property through survey evaluation. Based on the review of building permits from 1936, the property was modernized to what it looks like today.	Distant limited view of Project Site looking northwest, from over 1.5 blocks away. Separated from the Project Site by other intervening buildings.

TABLE IV.C-2
SUMMARY OF IDENTIFIED HISTORICAL RESOURCES IN PROJECT VICINITY

Map No.	APN #	Address	Resource	Date Built	Listing Eligibility	Views of Project Site
9	5546004026	6316-24 Yucca St.	Art Deco Storefronts	1932	Appears eligible for listing on the NR as an individual property through survey evaluation.	Primary view to north toward Yucca Street away from Project Site; however, Project Site adjacent on south.
10	5546003016	6305 Yucca St.	Yucca-Vine Tower	1929	Appears eligible for listing in the National Register as an individual property through survey evaluation.	Direct view of Project Site across Yucca Street looking south and southeast.
Appears Individually Eligible for Listing on the California Register						
A	N/A	Generally bounded by Cherokee Ave. on the west, various parcels east of Ivar Ave. on the east, Franklin Ave. to the north, and various parcels south of Yucca St. to the south	Hollywood North Multi-Family Residential Historic District	1919-1940	Appears eligible for listing in the California Register as a historic district through survey evaluation.	Views looking south and southeast. Physically separated from Project Site by other intervening buildings and streets.
4	5546031030	6125 Carlos Ave.	St. Stephen's Episcopal Church	1921	Appears eligible for listing in the California Register as an individual property through survey evaluation.	Over one block away and physically separated from the Project Site by other intervening buildings and the 17-story Argyle House. No direct view possible.

TABLE IV.C-2
SUMMARY OF IDENTIFIED HISTORICAL RESOURCES IN PROJECT VICINITY

Map No.	APN #	Address	Resource	Date Built	Listing Eligibility	Views of Project Site
7	5546005016	1723 Ivar Ave.	Two-story commercial building	1915; 1940	Appears eligible for listing in the California Register as an individual property through survey evaluation.	No direct view of the Project Site; the 10-story Knickerbocker Hotel, which is located directly across the street, blocks views to the east. However, partial views of the West Site to the northeast would be visible.
8	5546005019	1741 Ivar Ave.	Hollywood-Ivar Building	1954	Appears eligible for listing in the California Register as an individual property through survey evaluation.	Direct view of Project Site looking east across Ivar Ave. Physically separated from Project Site by Ivar Ave.
A.9	5546002008	1851 Ivar Ave.	Chateau Alto Nido	1930	Appears eligible for listing in the California Register both individually and as a contributor to a California Register eligible district through survey evaluation. – Hollywood North Multi-Family Residential Historic District	Partial views of the Project Site to the southeast.
A.10	5546005025	6358 Yucca St.	St. Elmo Apartments	1924	Appears eligible for listing in the California Register as a contributor to a district through survey evaluation. – Hollywood North Multi-Family Residential Historic District.	Street-facing elevation faces north, away from the Project Site so that views of Project Site, located southeast, are not possible.

TABLE IV.C-2
SUMMARY OF IDENTIFIED HISTORICAL RESOURCES IN PROJECT VICINITY

Map No.	APN #	Address	Resource	Date Built	Listing Eligibility	Views of Project Site
A.12	554600219	1817 Ivar Ave.	Two-story Tudor Revival apartment building	1923	Appears eligible for listing in the California Register both individually and as a contributor to a California Register eligible district through survey evaluation. – Hollywood North Multi-Family Residential Historic District	Physically separated by the Project Site by other buildings, streets, or distance so that only limited views of the Project Site are possible when looking southeast.
Locally Designated/Contributor to a National Register Listed District						
B.1	5546030001	6233 Hollywood Blvd.	Pantages Theatre	1929	HCM# 193. Contributor to a historic district listed in National Register by the Keeper. Listed in the California Register as a contributor to a historic district.	Project Site is adjacent to north and northeast
B.2	5546030036	6253 Hollywood Blvd.	Hollywood Equitable Building	1929	HCM #1088. Contributor to a historic district listed in the National Register by the Keeper. Listed in the California Register as a contributor to a historic district.	Views oriented toward Hollywood and Vine away from Project Site. Physically separated from Project Site to north by another intervening building.
B.3	5546004403	1735 N. Vine St.	Avalon Hollywood	1926	Contributor to a historic district listed in the National Register by the Keeper. Listed in the California Register as a contributor to a historic district.	Direct view of Project Site looking northwest, north, and east. Project Site (West Site) is adjacent to north.

TABLE IV.C-2
SUMMARY OF IDENTIFIED HISTORICAL RESOURCES IN PROJECT VICINITY

Map No.	APN #	Address	Resource	Date Built	Listing Eligibility	Views of Project Site
B.4	5546004031	1714 N. Ivar Ave.	Hollywood Knickerbocker Hotel	1923/1929	Contributor to a historic district listed in the National Register by the Keeper. Listed in the California Register as a contributor to a historic district.	Street-facing elevation faces west, away from the Project Site so that direct views of Project Site, located north and northeast, are not possible. Physically separated from Project Site (West Site) by another building.
B.5	5546004011	6331 Hollywood Blvd.	Guaranty Building (L. Ron Hubbard Life Exhibition Building)	1923	Contributor to a historic district listed in National Register by the Keeper. Listed in the California Register as a contributor to a historic district.	Street-facing elevations face south and west, away from the Project Site so that direct views of Project Site, located north and northeast, are not possible.
B.6	5546005014	6349 Hollywood Blvd.	Regal Shoe Store	1939	Contributor to a historic district listed in the National Register by the Keeper. Listed in the California Register as a contributor to a historic district.	Potential for partial views of the of Project Site looking northeast.
B.7	5546005029	6381 Hollywood Blvd.	Security Trust and Savings Building	1921	HCM #334 Contributor to a historic district listed in National Register by the Keeper. Listed in the California Register as a contributor to a district.	Limited views of the Project Site to the northeast over half block away.

TABLE IV.C-2
SUMMARY OF IDENTIFIED HISTORICAL RESOURCES IN PROJECT VICINITY

Map No.	APN #	Address	Resource	Date Built	Listing Eligibility	Views of Project Site
B.8	5546008001	6380 Hollywood Blvd.	Owl Drug Company; Julian Medical Building	1934	Contributor to a historic district listed in the National Register by the Keeper. Listed in the California Register as a contributor to a district.	Physically separated from the Project Site by other buildings, streets or distance so that only limited views of the Project Site are possible looking northeast.
B.9	5546008019	6360 Hollywood Blvd.	Palmer Building	1921/22	Contributor to a historic district listed in the National Register by the Keeper. Listed in the California Register as a contributor to a district.	Physically separated from the Project Site by other buildings, streets or distance so that only limited views of the Project Site are possible looking northeast.
B.10	5546008021	6350 Hollywood Blvd.	Leed's	1935	Contributor to a historic district listed in the National Register by the Keeper. Listed in the California Register as a contributor to a district.	Physically separated from the Project Site so that only partial views of the West Site are possible looking northeast.
B.11	5546009004	6324 Hollywood Blvd.	Regency Building	1922	Contributor to a historic district listed in the National Register by the Keeper. Listed in the California Register as a contributor to a district.	Physically separated from the Project Site so that only partial views of the Project Site are possible looking north and northeast.
B.12	5546009050	6300 Hollywood Blvd.	B.H. Dyas Department Store Building/ Broadway Department Store	1927	HCM #664. Contributor to a historic district listed in the National Register by the Keeper. Listed in the California Register as a contributor to a district.	Physically separated from the Project Site so that only partial views of the Project Site are possible looking north and northeast.

TABLE IV.C-2
SUMMARY OF IDENTIFIED HISTORICAL RESOURCES IN PROJECT VICINITY

Map No.	APN #	Address	Resource	Date Built	Listing Eligibility	Views of Project Site
B.13	5546029001	1680 N. Vine St.	Taft Building and Neon Sign	1923	HCM #666. Contributor to a historic district listed in the National Register by the Keeper. Listed in the California Register as a contributor to a district.	Physically separated from the Project Site by other buildings, and distance so that only limited views of the Project Site are possible looking northwest.
3	6646031005	1750 Argyle Ave.	Former Site of the Little Country Church of Hollywood	1934	HCM #567. Site only. Building destroyed by fire in 2008.	View of Project Site looking west across Argyle Ave.
6	5546004013	6321-6323 Hollywood Blvd.	Vine Theatre	1927	Identified as eligible for local listing through survey evaluation. Non-contributing building to a historic district listed in the National Register and California Register.	No view.
11	N/A	Hollywood Blvd. between La Brea Ave. and Gower Ave. Vine St. between Yucca St. and Sunset Blvd.	Hollywood Walk of Fame	Designed in 1958	HCM #194 Contributor to a historic district listed in the National Register by the Keeper. Listed in the California Register as a contributor to a historic district.	Views of Project Site looking east and west adjacent to Project Site along Vine St. Partial views of Project Site from intersections with Ivar (northeast), Vine (northeast and northwest), and Argyle (northwest).

SOURCE: Historic Resources Group, Historic Resources Technical Report, March 2020. Provided in Appendix F-1 of this Draft EIR.

(i) Hollywood Boulevard Commercial and Entertainment District, No. B

(a) 6233 Hollywood Boulevard (Pantages Theatre), Map No. B.1

This two-story steel frame and concrete theater is located on the northwest corner of Hollywood Boulevard and Argyle Avenue, directly south of the East Site. The Pantages Theatre was constructed in 1929 and opened in 1930. It was designed by architect B. Marcus Priteca in Art Deco style. It is rectangular in plan. The building's primary Hollywood Boulevard façade is dominated by a central public theater entrance with overhanging canopy marquee and a vertical neon sign spelling out "PANTAGES" in capital letters. A stepped and fluted ziggurat-like volume projects above the roofline.[31] Commercial storefronts and the public entrance to second floor offices flank the public theater entry. The building's primary façade is articulated by shallow recessed window and storefront bays divided by fluted vertical piers. Decorative elements include lotus motif cast stone panels, "zig-zag" metal window frames and sculpted Egyptian goddess figures. The building is 44 feet tall at the cornice line along Hollywood Boulevard. Theater housing at the rear of the parcel is 68 feet in height.

(b) 1735 Vine Street (Avalon Hollywood), Map No. B.3

This concrete building is located on the west side of Vine Street, mid-block between Hollywood Boulevard and Yucca Street, directly south of the West Site. Designed by H. L. Gogerty and Carl Jules Weyl, the Spanish Colonial Revival style building was constructed in 1926 as a live performance theater. The building façade appears as a two-story building along Vine Street rising 34 feet to the cornice line. Housing for the theater auditorium (at the central portion of the parcel) increases to 58 feet. Stage housing at the rear of the property is 134 feet high. The primary façade has a second-story central bay window above a recessed ground-floor entrance. Both the window and entrance are surrounded by elaborate Churrigueresque-style decoration.[32] Additional features include cast decorative medallions and quoins.

(c) 6253 Hollywood Boulevard (Equitable Building), Map No. B.2

This twelve-story, 147-foot, steel frame and concrete building is located south of the East Site at the northeast corner of Hollywood Boulevard and Vine Street. Constructed in 1929, the Equitable Building was designed by Aleck Curlett in Art Deco style with abstracted Gothic details. The building has a U-shaped plan with

31 A ziggurat is a rectangular, stepped tower.

32 Churrigeresque is a Spanish Baroque style comprised of elaborate sculptural stucco architectural ornament/decoration.

a two-story section joining the north and south wings on Vine Street. Important architectural features include full-height vertical piers delineating the window bays; fifth-floor balconies supported by Gothic-influenced sculpted figures; and a steeply pitched, copper-clad hipped roof capping the rectangular volume at the building's southeast corner. An open-panel sign support structure sits on the roof. The current illuminated rooftop sign was installed in 2007.

(d) 1680 N. Vine Street (Taft Building and Neon Sign), Map No. B.13

This twelve-story steel frame and concrete building is located half a block south of the East Site at the southeast corner of Hollywood Boulevard and Vine Street. Constructed in 1923, the Taft Building was designed by Walker & Eisen in Beaux Arts style. The building is L-shaped in plan with a symmetrical fenestration pattern and Classical tripartite differentiation of ground floor, mid-section, and crown. The ground floor and mezzanine levels feature pilasters detailed in a Classical manner and a central primary entrance framed by Classical columns. A cornice separates the ground floor from the building's brick-clad mid-section. The building's top floors are clad in smooth plaster with Corinthian pilasters and topped with a bracketed cornice at the parapet. There is a vertical neon sign spelling out "TAFT BLDG" in capital letters at the northwest corner of the building.

(e) 6300 Hollywood Boulevard (B.H. Dyas Department Store Building/Broadway Department Store), Map No. B.12

This nine-story steel frame and concrete building is located half a block south of the West Site, at the southwest corner of Hollywood Boulevard and Vine Street. Constructed in 1927, the Dyas Building was designed by Parkinson & Parkinson in Beaux Arts style. The building is rectangular in plan with a symmetrical fenestration pattern and Classical tripartite differentiation of ground floor, mid-section, and crown. The ground floor and mezzanine levels feature Classically-detailed pilasters and a central primary entrance framed by Classical columns. A cornice separates the ground-floor from the building's brick-clad mid-section. The building's top floors have a Corinthian colonnade topped with a bracketed cornice. There is an eight-story International Style addition to the western façade, and a neon roof sign spelling out "THE BROADWAY HOLLYWOOD."

(f) 1714 N. Ivar Avenue (Knickerbocker Hotel), Map No. B.4

This twelve-story, 124-foot, steel frame and concrete building is located south of the West Site on the east side of Ivar Avenue. The Renaissance Revival style building was originally constructed in 1923 as an apartment-hotel.[33] It was substantially remodeled in 1929 by architect John M. Cooper. The ground-floor

[33] City of Los Angeles Permit No. 51476. A Certificate of Occupancy was issued in 1926 but it is unclear if the building actually opened until 1929.

entry was re-designed in the 1950s. The building is U-shaped in plan with the opening of the U facing the rear of the property. The primary Ivar Avenue façade is recessed above the central ground-floor entrance and features a symmetrical fenestration pattern. A stringcourse delineates the ground floor from the brick clad upper floors.[34] Important architectural features include cast stone decorative surrounds on key windows and a decorative cornice above the roofline. A metal frame rooftop sign mounted with individual letter panels spells out "THE KNICKERBOCKER."

(g) 6331 Hollywood Boulevard (Guaranty Building), Map No. B.5

This twelve-story, 150-foot, steel frame and concrete building is located south of the West Site at the northeast corner of Hollywood Boulevard and Ivar Avenue. Constructed in 1923, the Guaranty Building (also known as the L. Ron Hubbard Life Exhibition Building) was designed by John C. Austin in Beaux Arts style. The building is rectangular in plan with a symmetrical fenestration pattern and Classical tripartite differentiation of ground floor, mid-section, and crown. The ground floor and mezzanine levels have Classically-detailed pilasters and a central primary entrance framed by Classical columns. A cornice separates the ground-floor from the building's brick-clad mid-section. The building's top floors are clad in smooth plaster and topped with a wide cornice. A metal frame rooftop sign is mounted with south-facing script letterforms spelling out "SCIENTOLOGY."

(h) 6324 Hollywood Boulevard (Regency Building), Map No. B.11

This two-story building is located on the south side of Hollywood Boulevard between Ivar Avenue and Vine Street. The Regency Building was constructed in 1922. It was remodeled in 1931 by the architectural firm of Morgan, Walls & Clement in French Chateauesque style. The building is rectangular in plan with a flat roof with a low parapet. The primary façade has a false, steeply pitched hipped roof with decorative spires flanked by side gables. Exterior walls are clad in smooth cement plaster with terra cotta decorative detailing. The ground floor features contemporary metal frame storefronts with awnings.

(i) 6350 Hollywood Boulevard (Leed's), Map No. B.10

This one-story reinforced concrete building is located on the southwest corner of Hollywood Boulevard and Ivar Avenue. Leed's was constructed in 1935 by noted theater architect, S. Charles Lee, as a composition influenced by International Style. The building is rectangular in plan and a flat roof and high parapet. The building features a projecting blade sign volume at the northeast corner. A cantilevered metal canopy wraps the building's north and east façades. Exterior

[34] A stringcourse is a raised horizontal band or course of bricks on a building.

walls are clad in smooth cement plaster. Fenestration consists of fixed wood frame windows with divided lights and small metal frame fixed and slider windows. Two entrances are located at the northeast corner. The building has been substantially altered but appears to retain some original features.

(j) 6360 Hollywood Boulevard (Palmer Building), Map No. B.9

This four-story reinforced concrete building is located on the southeast corner of Hollywood Boulevard and Cosmo Street. The Palmer building was designed by architect Edward Flaherty and was originally constructed in 1921 as a three-story building. A fourth story was added in 1922.[35] The building is rectangular in plan with a flat roof and low parapet. Exterior walls are clad in brick masonry. Decorative details include pilasters, dentils and decorative terra cotta. Fenestration consists of wood frame and sash double-hung windows.

(k) 6380 Hollywood Boulevard (Owl Drug Co.; Julian Medical Building), Map No. B.8

This two-story reinforced concrete building is prominently located on the southeast corner of Hollywood Boulevard and Cahuenga Boulevard. The building was built in 1934 by architectural firm Morgan, Walls & Clements in a Streamline Moderne/Art Deco style. The building is rectangular in plan with a flat roof; exterior walls are clad in smooth cement plaster. The second story features a rounded corner set off by a concave decorative surround and projecting blade sign. Metal-frame multi-light ribbon windows wrap the rounded corner on the second floor. The west-facing façade is distinguished by a recessed entry set between vertical piers and shaded by a projecting canopy. Additional vertical piers with separate metal-frame windows on the second floor.

(l) 6381-6385 Hollywood Boulevard (Security Trust and Savings Building), Map No. B.7

This seven-story steel reinforced masonry structure is prominently located on the northeast corner of Hollywood Boulevard and Cahuenga Boulevard. It was constructed in 1921 and designed by the noted architecture firm of Parkinson & Parkinson in Italian Renaissance Revival style. The building is rectangular in plan with a flat roof. The primary south- and west-facing façades are classically organized with a tripartite division to suggest base, shaft, and capital and are symmetrically arranged.

Exterior walls are clad in matte glazed terra cotta to imitate grey granite or limestone with a polished granite base topped by a decorative cornice with

35 City of Los Angeles Permit No. 19663, August 18, 1921; City of Los Angeles Permit No. 20265, June 14, 1922.

brackets and dentils. The recessed primary entrance on Hollywood Boulevard includes metal-frame, fully glazed double doors with a decorative surround featuring pilasters, dentils, and transom.[36] The entrance off Cahuenga Boulevard is recessed under a decorative cornice supported by brackets with bas-relief details and a decorative surround.[37] Fenestration consists of double-height picture windows on the first floor and paired metal frame double-hung windows on the upper stories. Window pairs above the first floor are banded vertically within a decorative double arch separated by pilasters with decorative terra cotta turned posts. The rear (north) façade is devoid of decorative cladding and details.

(m) 6349 Hollywood Boulevard (Regal Shoe Store), Map No. B.6

This two-story commercial building is located southwest of the West Site at the northwest corner of Hollywood Boulevard and Ivar Avenue. Constructed in 1939, the Regal Shoe Store was designed by Walker & Eisen in the Streamline Moderne style. The building is rectangular in plan with a curved corner at the southeast. There are horizontal bands of metal frame windows and flat canopies above, and metal frame porthole windows. Exterior walls are clad in smooth plaster. The roof is barrel-vaulted with parapet. The ground floor storefronts have been altered.

(n) 6316-6324 Yucca Street (Art Deco Commercial Building), Map No. 9

Constructed in 1932, this two-story plus mezzanine mixed-use building is located immediately north of the West Site on Yucca Street between Vine Street and Ivar Avenue. The building is irregular in plan with smooth cement plaster wall cladding. The cornice line is approximately 30 feet tall at its highest point. A recessed second story with a shallow-pitched roof is set behind a tall stepped parapet. The building has six retail storefronts on the ground floor. The second floor contains office spaces. It is Art Deco in style, and features fluted piers, a stepped cornice line, recessed storefront entries, and decorative tile trim.

(o) 1750 Argyle Avenue (former site of Little Country Church of Hollywood), Map No. 3

The former site of the Little Country Church of Hollywood is located on the east side of Argyle Avenue, just across the street from the East Site. Originally constructed in 1932, the Little Country Church building was destroyed by fire in 2008.

[36] A pilaster is a rectangular column that projects from a wall. Dentils are classical decorative elements, comprised of rectangular blocks resembling teeth, which are typically applied below a soffit cornice. A transom is a transverse horizontal structural beam or bar that separates a door from a window above it.

[37] A bas-relief is a form of sculpture that is carved from a flat, two-dimensional plane, creating a three-dimensional appearance.

(p) 6125 Carlos Avenue (St. Stephen's Episcopal Church), Map No. 4

This two-story wood frame church and parish hall building is located on the north side of Carlos Avenue between Vista del Mar Avenue and North Gower Street. It occupies a large parcel with a surface parking lot along Carlos Avenue. St. Stephen's Episcopal Church was constructed in 1921 designed in Spanish Colonial Revival style. In 1949, a parish hall addition designed by architect Carleton M. Winslow, Jr. was attached to the church. The combined building is irregular in plan with horizontal massing and a prominent bell tower. It has varied gable roofs with red clay barrel tiles. Exterior walls are clad in smooth cement plaster with pierced screen details. Fenestration consists of arched stained-glass windows and wood sash, divided light casement windows. The north-facing primary entrance is recessed under an arched opening leading to an open courtyard. The property is contained by perimeter metal fencing.

(q) 6122 Hollywood Boulevard (Fonda Theatre/Music Box Theater), Map No. 5

This two-story theater building is located on the south side of Hollywood Boulevard between North El Centro Avenue and North Gower Street. Constructed in 1926, the building is rectangular in plan with a flat roof and a shaped parapet. The primary façade includes a projecting blade sign, cantilevered marquee with neon light tubing and a recessed main entry. Exterior walls are clad in cement plaster, painted brick, and corrugated metal sheeting.

(r) 6319-6323 Hollywood Boulevard (Vine Theatre), Map No. 6

This one-story reinforced concrete building is located south of the West Site, on the north side of Hollywood Boulevard between Ivar Avenue and Vine Street. The building represents the 1940 conversion of a 1927 store building into a motion picture theater by architect S. Charles Lee. The building is rectangular in plan with a bow-truss roof over the auditorium and flat roof over the front lobby. Both are clad in built-up roofing. Exterior walls are clad in smooth cement plaster and tile. The primary (south) facade is distinguished by a projecting marquee with two signs that spell out "Vine" in script. A ticket booth is located below the marquee. Letters were added to the existing marquee in 1961. In 1968, the main entrance and marquee were altered.

(s) 1723 Ivar Avenue, Map No. 7

This two-story commercial building is located west of the West Site, on the west side of Ivar Avenue between Hollywood Boulevard and Yucca Street. Originally

constructed in 1915 as an apartment building,[38] 1723 Ivar Avenue was converted to a mixed-use commercial and apartment building in 1940 and was substantially altered at that time. It has a rectangular plan with horizontal bands of metal frame windows and a flat roof with parapet. The exterior walls are clad in smooth plaster. The building was remodeled in 2018.

(t) 1741 Ivar Avenue (Hollywood-Ivar Building), Map No. 8

This two-story with penthouse commercial building is located west of the West Site, on the west side of Ivar Avenue between Hollywood Boulevard and Yucca Street. Constructed in 1954, the Hollywood-Ivar Building was designed by Earl Heitschmidt in International Style. The building is U-shaped in plan with horizontal bands of metal frame hopper windows and a flat roof clad in built-up roofing. The exterior walls are clad in masonry veneer and smooth plaster. The ground floor has been remodeled at the southern end of the primary east-facing façade. The building is wrapped by an L-shaped parking lot on its north- and west-facing façades. The parking lot is contained by a perimeter concrete block wall covered in vines.

(u) 6305 Yucca Street (Yucca-Vine Tower), Map No. 10

This eight-story, 123-foot building is located north of the West Site at the northwest corner of Yucca and Vine Streets. Constructed in 1929, the Art Deco building was designed by architects H.L. Gogerty and Carl Jules Weyl for Mountain States Life Insurance. The commercial office building has a central tower rising from a two-story, rectangular base. The building is U-shaped in plan with the opening of the U facing the rear of the property. The symmetrical fenestration pattern in the central tower consists of vertical bands of metal frame fixed and casement windows with decorative cast spandrel panels. There are cast stone decorative elements on the piers, spandrels, lintels, and parapet. The building is set back from Yucca Street by a paved plaza surrounded by a high hedge wall at the sidewalk. This area was originally landscaped and open to the street. The building is currently used as the Los Angeles campus for AMDA.

(ii) Vista Del Mar/Carlos District, Map No. C

The Vista Del Mar/Carlos District is located just east of the Project's East Site. It includes parcels on the south side of Carlos Avenue between Vista Del Mar Avenue and Gower Street, and parcels on both sides of Vista Del Mar Avenue between Carlos Avenue and Yucca Street. When originally identified, the District contained

38 City of Los Angeles Permit No. 5427 and No. 5428 both indicate that the first permits issued for the construction of this building were issued on April 9, 1915. However, it is also important to note that there is a discrepancy between the LA County Assessor's records for this address and the permits. The LA County Assessor's records indicate that the building was constructed in 1926, rather than 1915. Based upon the brief description of the building offered in the permits, it appears most likely that the permits provide the correct construction date rather than the LA County Assessor's records.

16 contributing residential properties constructed between 1910 and 1924. Since that time, one contributor (6142 to 6144 Carlos Avenue) was demolished. Another contributor (1771 Vista del Mar) has been substantially altered. Today, the District contains 14 contributing properties. The dominant architectural style is Craftsman, but Mediterranean and vernacular architecture are also represented. A summary of those buildings that are contributors to the Vista Del Mar/Carlos District is provided in **Table IV.C-3**, *Summary of Contributors to Vista Del Mar/Carlos District*.

TABLE IV.C-3
SUMMARY OF CONTRIBUTORS TO VISTA DEL MAR/ CARLOS DISTRICT

No.	Address	Building Type	Architectural Style	Date Constructed
C.1	6118 Carlos Avenue	2.5-story Residence	Craftsman	1910
C.2	6122 Carlos Avenue	2.5-story Residence	Craftsman	1911
C.3	6128 Carlos Avenue	2.5-story Residence	Craftsman	1913
C.4	6136 Carlos Avenue	2.5-story Residence	Craftsman	1912
C.5	1735 N Gower Street	One-story Residence	Craftsman	1908
C.6	1750 Vista del Mar	One-story Residence	Craftsman	1914
C.7	1751 Vista del Mar	One-story Residence	Craftsman	1915
C.8	1756 Vista del Mar	2.5-story Residence	Craftsman	1914
C.9	1757 Vista del Mar	Two-story Residence	Vernacular	1914
C.10	1760 Vista del Mar	One-story Residence	Craftsman	1911
C.11	1762 Vista del Mar	Two-story Residence	Vernacular	1913
C.12	1763 Vista del Mar	One-story Residence	Spanish Colonial Revival	1922
C.13	1765 Vista del Mar	Two-story Residence	Vernacular	1918
C.14	1770 Vista del Mar	Two-story Residence	Craftsman	1914

SOURCE: Historic Resources Technical Report, March 2020. Provided in Appendix F-1 of this Draft EIR

(i) Potentially-Eligible Hollywood North Multi-Family Residential Historic District, Map No. A

A large grouping of multi-family residential buildings constructed between 1919 and 1940 was identified as a potential historic district eligible for listing in the California Register by the Hollywood Community Redevelopment Area Survey, published in 2010. The identified historic district is generally bounded by Cherokee Avenue on the west, Ivar Avenue on the east, Franklin Avenue on the north, with various parcels south of Yucca Street making up the southern boundary (Map No. A). It contains 41 contributing multi-family residential properties ranging from luxury apartment hotels to modest bungalow courts. Contributing properties to the

potential historic district are designed in a wide variety of architectural styles and range from one- to ten stories in height.

A summary of those buildings in the Potential Hollywood North Multi-Family Residential Historic District that are contributors to the potential district is provided in **Table IV.C-4**, *Summary of Contributors to the Potentially-Eligible Hollywood North Multi-Family Residential Historic District*. The properties that are both identified as district contributors and have the potential to be subject from indirect impacts from the Project includes only a portion of the potential historic district east of Cahuenga Boulevard.

TABLE IV.C-4
SUMMARY OF CONTRIBUTORS TO THE POTENTIALLY-ELIGIBLE HOLLYWOOD NORTH MULTI-FAMILY RESIDENTIAL HISTORIC DISTRICT

No.	Address	Building Type	Architectural Style	Date Constructed
A.1	1830 N. Cahuenga Blvd.	Apartment Building	Renaissance Revival	1923
A.2	6320 Franklin Avenue/1850 N. Ivar Avenue	Apartment Building	Spanish Colonial Revival	1923
A.3	6400 Franklin Avenue (Lynn Manor)	Apartment Building	Renaissance Revival	1928
A.4	6406 Franklin Avenue	Apartment Building	Renaissance Revival	1923
A.5	1810 N. Ivar Avenue	Two-story Apartment Building	Renaissance Revival	1921
A.6	1812 N. Ivar Avenue	Bungalow Court	American Colonial Revival	1922
A.7	1825 N. Ivar Avenue (Ivar Hills Apartments)	Two-story Apartment Building	Tudor Revival	1923
A.8	1836 N. Ivar Avenue	Half Court	Spanish Colonial Revival	1921
A.9	1851 N. Ivar Avenue (Chateau Alto Nido)	Four- and five-story Apartment Building	Mediterranean Revival	1924
A.10	6358 Yucca Street (St. Elmo Apartments)	Three-story Apartment Building	Mediterranean Revival	1924
A.11	6376 Yucca Street (Halifax Apartments)	Four-story Apartment Building	Renaissance Revival	1923
A.12	1817 N. Ivar Avenue	Two-story Apartment Building	Tudor Revival	1923

SOURCE: Historic Resources Technical Report, March 2020. Provided in Appendix F-1 of this Draft EIR

(ii) Hollywood Walk of Fame, No. 11

Designed by Southern Californian artist Oliver Weismuller in 1958, the sidewalk's pavement is imbedded with over 2,000 five-pointed stars added over the years featuring the names of people commemorated for their contributions to the entertainment industry. The portion of the Hollywood Walk of Fame that borders the Project Site is along Vine Street between Hollywood Boulevard and Yucca Street (on both the west and east sides of the street). This portion of the Hollywood Walk of Fame contains approximately 119 stars honoring a wide range of entertainment industry luminaries, including screenwriter and film director Billy Wilder, actress and director Ida Lupino, actor Lionel Barrymore, and comedian Johnny Carson. The Hollywood Walk of Fame is administered by the Hollywood Chamber of Commerce and maintained by the self-financing Hollywood Historic Trust, an arm of the Chamber of Commerce (Hollywood Chamber of Commerce/ Hollywood Historic Trust).

The sidewalk is paved with dark grey marble slabs, each inlaid with a five-pointed star of pink terrazzo rimmed with bronze. The honoree's name is inlaid in bronze inside the pink star along with a circular bronze emblem, indicating the sub-category of the entertainment industry for which the person is being honored. Contributions to the five branches of the entertainment industry—motion pictures, television, radio, recording, and live theater—are recognized. Individuals who have made contributions in several categories have received multiple stars.

As described in *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation*, "setting" is the physical environment of a historic property. It describes "setting" as follows: "Whereas location refers to the specific place where a property was built or an event occurred, setting refers to the character of the place in which the property played its historical role. It involves how, not just where, the property is situated and its relationship to surrounding features and open space. Setting often reflects the basic physical conditions under which a property was built and the functions it was intended to serve. In addition, the way in which a property is positioned in its environment can reflect the designer's concept of nature and aesthetic preferences. The physical features that constitute the setting of a historic property can be either natural or manmade, including such elements as: topographic features (a gorge or the crest of a hill); vegetation; simple manmade features (paths or fences); and relationships between buildings and other features or open space. These features and their relationships should be examined not only within the exact boundaries of the property, but also between the property and its surroundings."[39]

The setting of the Hollywood Walk of Fame is highly urban. The Hollywood Walk of Fame is typically bordered on one side by building façades and the other side

[39] National Park Service, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation*, 1997.

has a nearly continuous concrete curb—as punctuated by occasional curb cuts—that separates and defines it from the adjoining asphalt roadway that spans its length. The side that is flanked by the concrete curb and adjacent roadway is typically punctuated by two types of vertical elements—parking meters that are interspersed along its length approximately every 20 feet and by large street trees that are often placed in the midpoint of the space between the meters. In addition, there are also other streetscape accoutrements—such as waste receptacles, newspaper dispensers, and signposts—that punctuate its length. In some instances, curb cuts from the adjacent roadway provide access to driveways that bisect the Hollywood Walk of Fame. In these instances, the brass stars embedded in the sidewalk that honor individuals who have contributed to the entertainment industry are typically partially covered with metal plates, ostensibly to either protect them in place until they can be relocated or to cover the void in the sidewalk left by a recently relocated star. Some sections of the Hollywood Walk of Fame are abutted to one side not by buildings, but by either parking lots—often demarcated with low or high fencing materials—or by landscaped areas adjacent to buildings. Canopies that protrude from buildings that border the Hollywood Walk of Fame sometimes extend over its length as well. The setting is also characterized by many non-permanent fixtures that contribute to the Hollywood Walk of Fame's urban character, such as temporary scaffolding erected over portions of the sidewalk, cars parked adjacent to it, small-scale temporary advertising signage, and pedestrian traffic along its length at all times of the day and night.

The setting of the Hollywood Walk of Fame is characterized by both continuity over time but also by change and movement. It is characterized by continuity in that the bronze stars affixed to its surface are permanently embedded there—but also by change and flow, as many of the man-made elements that mark its length at any given time—such as cars, temporary advertising signage and pedestrian traffic—are subject to movement. In fact, since the Hollywood Walk of Fame was first constructed in 1960, its setting has been marked by dramatic change over time. Permanent features, such as buildings, have been constructed along its length in the intervening years since its initial construction, while others have been demolished. More impermanent features of its setting—such as parking meters, street signage, building canopies, fencing materials and landscaping materials— also have been subject to change over time. Today, important permanent features of the setting are limited to the boundary and configuration of the sidewalk.

As a historical resource that was formally determined eligible for listing in the National Register by consensus determination through Section 106 review, a formal statement of significance previously has not been developed for the

resource, as a nomination form for the National Register has not been prepared.[40] The Hollywood Walk of Fame is also locally designated by the City as HCM #194; however, the designation, which was made in 1978, also does not have a formal statement of significance attached to it. However, the Hollywood Walk of Fame is likely eligible for listing in the National Register under Criterion A for its association with the development of Hollywood as a film-related tourist mecca in the latter half of the 20th century. The Hollywood Walk of Fame was established by the City of Los Angeles to honor prominent figures in the entertainment industry, and the first star was laid in 1960. Over time, the Hollywood Walk of Fame has evolved into an immensely popular and iconic tourist attraction that draws visitors to Hollywood from all over the world.

3. Archival Research

a) SCCIC Records Search

A records search for the Project was conducted on April 3, 2018, at the California Historical Resources Information System (CHRIS) South Central Coastal Information Center (SCCIC) housed at California State University at Fullerton. The search included a 0.5-mile radius for archaeological resources, and adjacent historic architectural resources. The 0.5-mile radius is appropriate in developed urban areas in order to provide a context with which to conduct sensitivity analysis.

(1) Previous Cultural Resources Investigations

The records search results indicate that 23 cultural resources studies have been conducted and are presently on-file with the SCCIC within a 0.5-mile radius of the Project Site. Approximately 60 percent of the 0.5-mile records search radius has been included in previous cultural resources surveys. Of the 23 previous studies, three studies overlap with the Project Site. These include LA-11797; -01578; and -03496.

(2) Previously Recorded Cultural Resources

The records search results indicate that one archeological resource and three historic architectural resources (two historic architectural districts) have been recorded within a 0.5-mile radius of the Project Site. Within the Project Site itself

[40] As described in the Code of Federal Regulations, 36 CFR Part 800, a federal agency embarking on a proposed project must first establish whether the project has the potential to affect an historic resource eligible to the National Register. If so, then the federal agency must begin the Section 106 review process. During a Section 106 review, the federal agency evaluates properties against the National Register criteria and seeks the consensus of the State Historic Preservation Office regarding eligibility. Simply coming to a consensus determination that a property is eligible for listing is adequate to move forward with Section 106 review; a historic property need not be formally listed in the National Register in order to be considered under the Section 106 process. However, all properties that are determined eligible to the National Register by consensus are automatically listed on the California Register of Historical Resources; therefore, they are considered historical resources for the purposes of CEQA.

there are two historic resources, the Capitol Records Building described above and the Gogerty Building. The one archaeological resource (P-19-003545) is a historic archeological site and consists of a foundation, structure pads, privies, a dump, and a trash scatter. The other three resources are historic architectural resources and consist of the Halifax Apartment Building (P-19-186999); the Vista Del Mar/Carlos Historic District (P-19-176308); and the Hollywood Boulevard Commercial and Entertainment Historic district (P-19-174178). As mentioned, within the Project Site itself are two additional historic architectural resources located on the East Site, the Capitol Records Building at 1750 N. Vine Street, and the H.L. Gogerty Building at 6272-6284 Yucca Street.

(i) Fern Dell (Griffith Park)

Although outside the 0.5-mile records search area, the nearest prehistoric site is 1.5-miles to the northeast of the Project Site is Los Angeles Cultural Monument (HCM) No. 112. Located within Griffith Park, Fern Dell (P-19-001096) is an early Gabrielino Indian Site. According to the HCM nomination, villages of the Gabrielino "dotted the river valleys and clustered along the Pacific Coast." Archaeological surveys uncovered the sites of villages at "the mouth of Fern Dell Canyon leaving no doubt that fairly large settlements existed" in northern Los Angeles, and received "Water from canyons leading from the Hollywood Hills" (Cultural Heritage Board, 1973).

b) Sacred Lands File Search

The NAHC maintains a confidential Sacred Lands File (SLF) which contains sites of traditional, cultural, or religious value to the Native American community. The NAHC was contacted on April 5, 2018 to request a search of the SLF. The NAHC responded to the request in a letter dated April 18, 2018. The results of the SLF search conducted by the NAHC indicate that Native American cultural resources are not known to be located within the Project Site and surrounding area. The City conducted consultation with appropriate tribes per CEQA requirements as modified by AB 52. The results of this consultation will be summarized in the tribal chapter of this EIR.

c) Geoarchaeological Review

Geologic mapping of the vicinity shows that the Project Site is underlain by alluvial fan deposits that consist of Holocene and late Pleistocene age gravel, sand, and silt, underlain by middle Pleistocene age alluvial fan deposits consisting of silt, sand, and gravel.[41] These deposits were laid down by floods and debris flows from the mountains to the north. A geotechnical report prepared for the site (Langan, 2012) indicates that beneath the modern asphalt and paving at the surface is a layer of artificial fill that extends between 1.5 to 7 feet below ground surface (bgs),

41 Dibblee, Jr., Thomas W. Geologic Map of the Hollywood and Burbank (South ½) Quadrangles, Los Angeles County, California. Dibble Geological Formation Map #DF-30, 1991.

which likely represents a historic disturbance layer. The fill is noted as containing brick, which could indicate the presence of historic period archaeological materials. Below the fill is Younger Alluvium, extending to depths of 18 to 23 feet below surface. The Holocene age of the Younger Alluvium indicates that there is potential for the presence of buried prehistoric archaeological resources within the Project Site. Below the Younger Alluvium is Old Alluvium, which generally is too old to contain archaeological materials. Given the depth of proposed excavation of 82 feet bgs for the installation of subterranean parking and foundations, the Project will encounter both the artificial fill and the Younger Alluvium.

d) Historic Maps and Aerial Photographs

Historic maps and aerial photographs were examined to provide historical information about land uses of the Project Site and to contribute to an assessment of the Project Site's archaeological sensitivity. Available topographic maps include the 1894 Los Angeles, 1896 Santa Monica, 1900 Los Angeles, 1902 Santa Monica 15-minute quadrangles; and the 1926, 1948 1953, 1966 and 1972 7.5-minute quadrangles. The available Sanborn Fire Insurance Maps for the Project Area included the following years: 1907, 1913, 1919, 1950, 1955, 1960, 1961, 1962, 1966, 1969, and 1970. Historic aerial photographs were available for the years 1928, 1938, 1948, 1952, 1954, 1964, and 1977 (EDR, 2017). A detailed discussion of the map review is provided in the Phase I Cultural Resources Assessment Report in Appendix F-2.

e) Survey Methods

A cultural resources survey of the Project Site was conducted on July 31, 2018, by ESA archaeologist Amber-Marie Madrid, B.A. The reconnaissance-level survey was aimed at identifying archaeological resources and the potential for archaeological resources within or immediately adjacent to the Project Site. The Project Site is entirely developed. The few landscaped surfaces on the Project Site were intensively inspected for the presence of archaeological materials. Existing on-site buildings and structures, as well as the immediate surroundings, were photographed. Two parking lots on the West Site were fenced and inaccessible. However, both lots were photographed and examined from adjacent locations, and both lots are paved.

f) Survey Results

The entire Project Site is developed with buildings or parking lots. No archaeological resources were identified as a result of the survey.

4. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a Project would have a significant impact related to cultural resources if it would:

Threshold (a): Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5;

Threshold (b): Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; or

Threshold (c): Disturb any human remains including those interred outside of formal cemeteries.

Under CEQA, and as relates to Threshold (a) above, a proposed development must be evaluated to determine how it may impact the potential eligibility of a structure(s) or a site for designation as a historical resource. The Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Standards) were developed as a means to evaluate and approve work for federal grants for historic buildings and then for the federal rehabilitation tax credit (see 36 Code of Federal Regulations (CFR) Section 67.7). Similarly, CEQA recognizes the value of the Standards by using them to demonstrate that a project may be approved without an EIR. In effect, CEQA has a "safe harbor" by providing either a categorical exemption or a negative declaration for a project which meets the Standards (see CEQA Guidelines Sections 15331 and 15064.5(b)(3)).

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions. The factors to evaluate cultural resources impacts are listed below:

(1) Built Environment

- A project would normally have a significant impact on a significant resource if it would cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5 when one or more of the following occurs:
  - Demolition of a significant resource.
  - Relocation that does not maintain the integrity and significance of a significant resource.

- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Standards).
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

(2) Archaeological Resources

- Is associated with an event or person of recognized importance in California or American prehistory or of recognized scientific importance in prehistory.
- Can provide information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable archaeological research questions.
- Has a special or particular quality, such as the oldest, best, largest, or last surviving example of its kind.
- Is at least 100 years old and possesses substantial stratigraphic integrity.
- Involves important research questions that historical research has shown can be answered only with archaeological methods.

b) Methodology

A project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment. In general, a significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). Substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired" (CEQA Guidelines Section 15064.5(b)(1)). In addition, while assessing the project's impacts under CEQA, it is important to consider the ability of the historical resources to retain their integrity. A project that diminishes the integrity of a resource such that the significance of a historical resource is materially impaired is a project that would result in a significant impact on the environment. This analysis of impacts to historical resources is based on the detailed technical information provided in the HRG Report provided in Appendix F-1, of this Draft EIR.

(1) Historical Architectural Resources

The analysis in this section of the Draft EIR is prepared by qualified personnel who meet and exceed the Secretary of the Interior's Professional Qualification Standards in history and architectural history. In addition, it is informed by

information presented in the HRG Report prepared in March 2020. As described within that document, the key steps taken in completing the Historical Resources Technical Report, which serves as the basis for this section of the Draft EIR, includes a review of the existing properties within the Project Site and within a 0.25-mile of the Project Site in order to address indirect impacts. Research of the Project Site's development included a review of historic building permits for improvements to the property, Sanborn Fire Insurance maps, historic photographs, aerial photos, and local histories. The California State Historic Resources Inventory (HRI) for Los Angeles County, Department of Parks and Recreation Historic Resources Inventory Forms, and SurveyLA Eligibility findings were consulted to identify any previous evaluations of Project Site and potential historic resources within a 0.25-mile radius of the property. Also consulted was the Community Redevelopment Agency (CRA) Historic Resources Survey: Hollywood Redevelopment Project Area, published in 2010. In addition, field examinations were conducted to review and confirm previous findings and to identify previously unevaluated properties that were potentially eligible as historical resources within the area where potential direct or indirect impacts could occur.

(2) Archaeological Resources

The analysis of impacts to archaeological resources is also based on the Phase I Cultural Resources Assessment Report, which included: (1) a cultural resource records search conducted at the SCCIC to review recorded archaeological resources within a 0.5-mile radius of Project Site, as well as a review of cultural resource reports and historic topographic maps on file, (2) a review of the California Points of Historical Interest (CPHI), the California Historical Landmarks (CHL), the California Register, the National Register, and the California State HRI listings, (3) an SLF search commissioned through the NAHC, (4) geoarchaeological review (5) a review of available Sanborn Maps, historic aerial imagery; and other technical studies, and (5) a pedestrian survey of the Project Site.

The potential for the Project Site to contain buried archaeological resources is assessed based on the findings of the cultural resource records search (i.e., presence and proximity of known resources) and SLF search, land use history research, subsurface geological conditions, and the proposed excavation parameters for the Project.

c) Project Design Features

No specific Project Design Features are proposed with regard to cultural resources.

d) Analysis of Project Impacts

Construction activities, including excavation depths, building footprint and construction methods, would be essentially the same under the Project or the Project with the East Site Hotel Option. Accordingly, Project-related construction impacts would be essentially the same under the Project or the Project with the East Site Hotel Option. Thus, the conclusions regarding the construction impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

Although the East Senior Building under the Project with the East Site Hotel Option would be two floors shorter than under the Project, both would similarly redevelop the Project Site. This difference in building height of the East Senior Building does not materially change the analysis of historical resources impacts under the Project. Accordingly, Project operational impacts discussed in the analyses below would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the impact analysis, mitigation measures, and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

Threshold (a): Would the Project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?

(1) Impact Analysis

(a) Direct Impacts

(i) Historical Resources on the Project Site

There are two historical resources on the Project Site that have the potential to be subject to a direct impact from the Project: the Capitol Records Building and the Gogerty Building. The analysis that follows addresses each resource individually.

(a) Capitol Records Building

The Project does not include the demolition, relocation, rehabilitation, alteration, relocation, or conversion of the Capitol Records Building. The Capitol Records Building would remain unchanged and in its original location after implementation of the Project. All of its exterior character-defining features, as well as its interior recording studios and reverberation chambers, would remain and continue to convey its historical significance. Therefore, the Project does not involve alteration that would result in a direct adverse impact to the Capitol Records Building. The Project or the Project the Project with the East Site Hotel Option may alter a portion of the existing surface parking lot located on the Capitol Records Building parcel

immediately east of the Capitol Records Building at the building's rear.[42] If it were to occur, the Project would reconfigure a small portion of the south end of the parking lot where it abuts the adjoining parking lot to the south, as landscape area. This alteration would not remove or destroy any portion of the Capitol Records Building, and the building's existing massing, form, and architectural features would remain intact and unchanged. While the rear parking lot is original to the development of the property by Capitol Records, its use as a parking lot is not critical to understanding the Capitol Records Building as a significant work of architecture or its important associations with the music industry. Ultimately, only a small portion of the parking lot would potentially be altered, and the use of that portion as a landscape area would maintain the existing rear open space located on the Capitol Records Building parcel. Accordingly, the Capitol Records Building would remain intact and retain its eligibility for listing in the National Register.

As previously noted, historical integrity is the ability of a historical resource to convey its historical significance. The Project would not affect the integrity of *location, design, materials, or workmanship* of the Capitol Records Building. The building would remain intact in its current location and would not be materially altered by new construction associated with the Project. As discussed above, the Project would have no direct adverse impact to the Capitol Records Building. Because the Capitol Records Building would retain integrity of *location, design, materials,* and *workmanship*, it would continue to reflect its architectural significance. Therefore, integrity of *feeling* would also remain unaffected because all the existing physical elements that characterize the Capitol Records Building would continue to convey the property's historic significance. Because the building was constructed for Capitol Records, Inc., the unique architecture quickly came to symbolize Capitol Records as an enterprise. As the Capitol Records has continued to occupy the building up to the present day, all the features important to its architectural significance also convey the building's association with Capitol Records, Inc. and the recording industry in Los Angeles. Therefore, integrity of *association* would also remain unaffected by the Project.

Accordingly, as the Project would not affect the location, design, materials, or workmanship of the Capitol Records Building, the direct impacts of the Project would not materially impair the building such that it would no longer convey its historic significance.

Therefore, direct impacts to the Capitol Records Building would be less than significant, and, in this regard, the Project or the Project with the East Site

[42] A portion of the parking lot adjacent to the Capitol Records Complex is proposed to be reconfigured and converted into open space under the Project or the Project with the East Site Hotel Option. However, the portion to be reconfigured is under lease to Capitol Records and subject to Capitol Records' consent during the term of the Capitol Records Lease.

Hotel Option would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.

(b) Gogerty Building

The Project does not include the demolition, relocation, rehabilitation, alteration, relocation, or conversion of the Gogerty Building. Alteration of the Gogerty Building's surroundings would not affect the integrity of *location, design, materials, or workmanship* of the Gogerty Building. The building would remain intact in its current location. Therefore, integrity of *feeling* would also remain unaffected because all the existing physical elements that characterize the Gogerty Building would continue to convey the property's historic significance. Because the Gogerty Building would retain integrity of *location, design, materials, workmanship*, and *feeling*, it would continue to reflect its architectural significance; therefore, integrity of *association* would also remain unaffected by the Project. The only aspect of integrity with potential for substantial adverse effects associated with the Project is *setting*. Setting features important to the Gogerty Building, however, are limited to the configuration of street and sidewalk fronting the building's north- and west-facing facades, which would remain unchanged by the Project. The larger setting, particularly parcels immediately north, south, east, and west have all been redeveloped since the original construction of the Gogerty Building and are not an important aspect of its surroundings. Therefore, the Gogerty Building would also retain integrity of *setting*. Despite the alteration to its surroundings, the historic integrity of the Gogerty Building would be retained. While the Project would introduce substantial new construction in the near vicinity of the Gogerty Building, this alteration would not materially impair the building such that it would no longer convey its historic significance. After construction of the Project, the Gogerty Building would remain intact, and in its original location. All of the building's important character-defining features, including the two-story massing, curved street-facing façade, recessed window and door openings, stepped entry surrounds and decorative vertical piers, would remain unchanged and continue to convey its historic significance. The Gogerty Building would remain unchanged and in its original location after implementation of the Project; due to this, its significance as a historical resource would remain intact and its eligibility for listing as a historical resource would be unaffected.

Therefore, no direct impacts on the Gogerty Building would occur, and the Project or the Project with the East Site Hotel Option would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.

(ii) Historical Resources Adjacent to the Project Site

As previously discussed in Subsection IV.C.2.b)(3)(e), *Identified Historical Resources in the Project Vicinity*, there are several historical resources located

immediately adjacent to the Project Site. They include the following: Hollywood Walk of Fame; Avalon Hollywood; Pantages Theatre, which is a contributing building to the Hollywood Boulevard Historic District that lines Hollywood Boulevard; and 6316-6324 Yucca. The analysis that follows addresses the potential for the Project to result in direct impacts to each of these resources.

(a) Hollywood Walk of Fame

The Project Site is located immediately adjacent to portions of the Hollywood Walk of Fame, which border the Project Site along Vine Street between Hollywood Boulevard and Yucca Street (on both the west and east sides of the street). In 1978, the City of Los Angeles designated the Hollywood Walk of Fame as a Historic-Cultural Monument (HCM #194). Portion of the Hollywood Walk of Fame's terrazzo sidewalk is situated adjacent to the west side of the East Site, and adjacent to the east side of the West Site; both portions are located on Vine Street between Yucca Street on the north and the East Site's south property line. This portion of the Hollywood Walk of Fame contains 39 stars, of which 9 are blank and 30 include the names of honorees. Among the 30 names are Billie Holiday, Ava Gardner, Mae West, Art Linkletter, the Three Stooges, Rick Dees, Esther Williams, and Tony Bennett. Some areas of the Hollywood Walk of Fame adjacent to the Project Site are in need of repair. The significance of the Hollywood Walk of Fame is conveyed in part by the individual stars in their respective locations and, to a lesser extent, by the terrazzo and bronze materials associated with the date of original installation.

As further described in Chapter II, *Project Description*, of this Draft EIR, the Project would enhance the Hollywood Walk of Fame along Vine Street with adjacent Project landscaping, streetlights, paving, and provision of a paseo and plaza near the northern terminus of the Hollywood Walk of Fame. The Project would also eliminate driveway access from Vine Street, including the removal of five existing curb cuts. These changes would increase public access to the resource and help restore continuity to the Hollywood Walk of Fame, while also reducing vehicle/pedestrian conflicts. However, portions of the Hollywood Walk of Fame fronting the Project Site could be affected during construction due to the presence of heavy construction equipment, generally high levels of activity, and the need for sidewalk improvements. Project construction, particularly during sidewalk improvements, would require the temporary removal of the bronze stars and terrazzo sidewalks on adjacent areas of the historic Hollywood Walk of Fame along Vine Street. In accordance with required procedures for alterations to the Hollywood Walk of Fame set forth in the Hollywood Walk of Fame Terrazzo Pavement Installation and Repair Guidelines (Walk of Fame Guidelines),[43] and in coordination with the Hollywood Chamber of Commerce/Hollywood Historic Trust,

[43] Hollywood Walk of Fame Terrazzo Pavement Installation and Repair Guidelines, as approved by the Los Angeles City Council on March 1, 2011, also known as the Hollywood Walk of Fame Specifications and Details (version dated 2-24-2011).

the City Office of Historic Resources (OHR), and the Department of Public Works, where stars or parts of the sidewalk cannot be protected in place, the locations would be recorded, and the stars crated and stored in an approved secured location. Once necessary construction work is completed, the stars would be replaced and restored in an appropriate manner in their original location with matching terrazzo. All restoration work within the Hollywood Walk of Fame shall be reviewed and approved by the Bureau of Engineering as required by LAMC Section 62.105, in conjunction with the review of the City Cultural Heritage Commission. Additional consultation and coordination during review and installation with the Hollywood Historic Trust and Hollywood Chamber of Commerce is also required. In accordance with the City of LAMC Section 62.110, all work shall be performed under a Public Works (A or B Permit) work permit, issued by the Bureau of Engineering.

The temporary removal of portions of the Hollywood Walk of Fame would have a temporary adverse effect on the Hollywood Walk of Fame, which would be considered a significant impact. However, through compliance with the Walk of Fame Guidelines and with implementation of Mitigation Measure CUL-MM-1, its eligibility as an Historic-Cultural Monument, and as a historical resource previously determined eligible for the National Register by a consensus determination through Section 106 review, would be maintained, and the areas restored would represent upgraded conditions for the Hollywood Walk of Fame. A copy of the Hollywood Walk of Fame Specifications and Details is included in Appendix F-1 of this Draft EIR**. Although there would be a potentially significant impact to the Hollywood Walk of Fame, with implementation of Mitigation Measure CUL-MM-1, the Project and the Project with the East Site Hotel Option would not cause a substantial adverse change in the significance of the Hollywood Walk of Fame under Section 15064.5, and, therefore, direct impacts to the resource would be less than significant**.

(b) Pantages Theatre

The Project does not include the demolition, relocation, rehabilitation, alteration, relocation, or conversion of the Pantages Theatre. The Pantages Theatre would remain unchanged and in its original location after implementation of the Project. due to this, its significance as a historical resource would remain intact. and its eligibility as a historical resource would be unaffected. **Therefore, no direct impacts on the Pantages Theatre would occur, and the Project and the Project with the East Site Hotel Option would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.**

(c) Avalon Hollywood

The Project does not include the demolition, relocation, rehabilitation, alteration, relocation, or conversion of the Avalon Hollywood. The Avalon Hollywood would

remain unchanged and in its original location after implementation of the Project; due to this, its significance as a historical resource would remain intact and its eligibility for listing would be unaffected. **Therefore, no direct impacts on the Avalon Hollywood would occur, and the Project and the Project with the East Site Hotel Option would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.**

(d) Art Deco Commercial Building/6316-6324 Yucca Street

The Project does not include the demolition, relocation, rehabilitation, alteration, relocation, or conversion of the commercial building at 6316-6324 Yucca Street. The building would remain unchanged and in its original location after implementation of the Project; due to this, its significance as a historical resource would remain intact and its eligibility for listing as a historical resource would be unaffected. **Therefore, no direct impacts on 6316-6324 Yucca Street would occur, and the Project and the Project with the East Site Hotel Option would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.**

(iii) Historical Resources in the Vicinity of the Project Site

As previously discussed above in the *Identified Historical Resources in the Project Vicinity* subsection, in addition to the historical resources located on and adjacent to the Project Site, there are many other historical resources located in the vicinity, including, but not limited to, a number of contributing and non-contributing buildings to the Hollywood Boulevard Historic District that line Hollywood Boulevard; the Vista Del Mar/Carlos District, which is determined eligible for listing in the National Register as an historic district and is listed in the California Register;[44] and the Hollywood North Multi-Family Residential District, which has been identified as potentially eligible to the National Register as a historic district. The Project does not include the demolition, relocation, rehabilitation, alteration, or conversion of any of these individually eligible or contributing or non-contributing historical resources in the vicinity of the Project Site. These historical resources are separated from the Project Site and would remain physically intact after implementation of the Project. **Therefore, as there would be no direct impacts on historical resources in the vicinity, the Project and the Project with the**

[44] "Determined eligible" means that the district previously was subject to a "consensus determination" through the Section 106 process as described earlier in this section. Therefore, it is not formally listed in the National Register at this time; however, it may be formally listed at a future point in time when a nomination to the National Register is submitted and approved by the Keeper. Districts that are determined eligible to the National Register are automatically placed in the California Register and are, therefore, considered historical resources under CEQA.

East Site Hotel Option would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.

(b) Indirect Impacts

(i) Historical Resources on the Project Site

(a) Capitol Records Building

The Capitol Records Building is located north and west of the new construction proposed for the East Site and across Vine Street from all new construction on the West Site. Therefore, the immediate surroundings of the Capitol Records Building to the south, east, and west would be substantially altered. Although the existing surface parking lots to be developed within the Project Site were existing when the Capitol Records Building was originally constructed, their presence is not intrinsic or related to the design of the Capitol Records Building, and, as such, not considered an associated character-defining feature. As discussed above, the Project would have no direct adverse impact to the Capitol Records Building. Furthermore, its status as a historical resource would not be substantially changed by alteration of its surroundings, as discussed in detail below.

The Project would construct four new buildings including a 35-story building on the West Site (West Building); a 46-story building on the East Site (East Building); and two 11-story senior housing buildings, one on each site (West Senior Building and East Senior Building). The 46-story East Building and 11-story East Senior Building would be located immediately south and east of the Capitol Records Building; and the 35-story West Building and 11-story West Senior Building would be located south and west of the Capitol Records Building, thereby adding considerable height and mass to an area currently occupied by surface parking and a one-story building.

Under the Project with East Site Hotel Option, 104 residential units within the East Building on Levels 3 through 12, would be replaced with a 220-room hotel, with no change to the building height or massing. However, the number of affordable residential units within the East Senior Building would be reduced by 17 units and the height of the building would be reduced from 11 stories to nine stories.

Both the East Building and West Building would be substantially taller than the Capitol Records Building. The juxtaposition of substantially taller buildings would alter the visual setting of the Capitol Records Building, which historically was one of the most visually prominent buildings in the Hollywood skyline until the late 1960s when several taller buildings were constructed on Sunset Boulevard.

The Capitol Records Building is significant for its association with the development of the music industry in Los Angeles and as an outstanding example of commercial architecture from the mid-20th century. Due to the building's architectural

significance, it is important that views showcasing its form and design details be maintained so that the distinctive architectural design of the building continues to be visible and understood. In addition to up-close views from Vine Street north of Hollywood Boulevard, as well as from Yucca Street and Argyle Avenue, important views include looking north up Vine Street from Hollywood Boulevard and views from the US-101.

Protection of the historical significance of the Capitol Records Building is a stated objective of the Project. To meet that objective, the Project includes setbacks, grade-level open space, and tower massing that would maintain important public street views to the Capitol Records Building and would ensure that new construction would be appropriately distanced so that the mass and scale would not obscure the distinctive shape and architectural features of the Capitol Records Building from public view.

The West and East Buildings, in relation to the Capitol Records Building, would be asymmetrically centered on Vine Street, to highlight the Capitol Records Building prominently. Both of the tower portions of the East Building and West Building would be convex shaped in plan with both buildings sited so that the tower mass tapers in toward Vine Street. On the East Site, the southwest corner of the proposed new tower component for the East Building would be set back 19.5 feet from Vine Street. The façade of the East Building would curve away from Vine Street, increasing the setback from Vine Street and pulling away from the Capitol Records Building. A paseo and grade-level public plaza would create a “buffer zone” between the East Site new development and the Capitol Records Building so that visual prominence of the building along Vine Street would be maintained (see Figure II-5, *Conceptual Site Plan*, in Chapter II, *Project Description*, of this Draft EIR). The paseo and plaza would also provide new public opportunities for closer viewing of the south and east façades of the Capitol Records building. Similarly, on the West Site, the West Building would be set back 15 feet from Vine Street at the southeast corner and curve away from Vine Street along the eastern façade. Overall, the bulk and mass of the both the East Building and the West Building would be reduced at Vine Street and much of the massing that comprises the towers of the two buildings would be placed away from the Capitol Records Building. In this way, important views from Vine Street and from the US-101 would be maintained (see Figure IV.A-12, *Key View 6*, and Figure IV.A-9, *Key View 3*, in Section IV.A, *Aesthetics*, of this Draft EIR).

In addition to maintaining important views of the Capitol Records Building, the Project architecture has been purposely designed to respond to the architectural character of the Capitol Records Building, long celebrated as an outstanding example of Mid-Century Modern architecture. The Project architecture would maximize focal views toward and through the Project Site, as discussed in Section IV.A. Aesthetics (1) Scenic Vistas, such as views of the Capitol Records Building and the Gogerty Building from sidewalks along Vine Street, Argyle Avenue, and

Yucca Street, from the intersection of Hollywood Boulevard and Vine Street, and a view through a surface parking lot between the Pantages Theatre and the Equitable Building. In addition, the curving façades of the East and West Buildings facing the Capitol Records Building recall the cylindrical form of the Capitol Records Building. Furthermore, the curving façades would be articulated with serrated balconies, a design feature inspired by the signature sunshades of the Capitol Records Building.

Although indirect impacts on the Capitol Records Building associated with the design of new construction and maintaining visual access are considered less than significant, the Project has the potential for other indirect impacts associated with construction to occur. As proposed new construction would include substantial excavation to accommodate the buildings' foundation and subterranean parking, there is potential for these activities to cause damage to the Capitol Records Building due to vibration or settlement given the building's close proximity to the construction activity. As is common in similar urban development sites, vibration and settlement would be controlled through adherence to design values prescribed by the shoring engineer and geotechnical engineer with the intent to prevent damage to adjacent structures and through monitoring of associated construction activities. Although steps would be taken during construction to help ensure design values are not exceeded, if exceedance were to occur and result in structural damage, such damage would likely be surficial and repairable based on industry practice and knowledge of construction activities in similar settings. Nonetheless, the potential for damage to this historical resource due to construction-related vibration and settlement is considered a significant impact, however, as further discussed in the *Mitigation Measures*, and *Level of Significance After Mitigation* subsections below, this impact would be reduced to a less than significant level through Mitigation Measure NOI-MM-4, and Mitigation Measure CUL-MM-2.

Potential construction affects, such as vibration and settlement, are also discussed in Sections IV.I, *Noise*, and IV.D, *Geology and Paleontological Resources*, of this Draft EIR.

The only aspect of integrity with potential for substantial adverse effects associated with the Project is *setting*. Because the Project would construct a 46-story East Building and up to an 11-story East Senior Building immediately south and east of the Capitol Records Building (as well as similar development on the West Site), thereby adding considerable height and mass to an area currently occupied by surface parking, the immediate surroundings of the Capitol Records Building would be altered. Setting features important to the Capitol Records Building, however, are limited to the building parcel, as well as the configuration of street and sidewalk fronting the building's west-facing façade. These important aspects of the historical setting of the Capitol Records Building would remain intact, including the public right-of-way along Vine Street. While permits from the City's Bureau of Engineering

would be required for approval of a median along Vine Street, the public entrance and primary façade of the Capitol Records Building would continue to face the sidewalk and street as has been the case since its original construction. The larger setting is not critical to understanding the historic significance of the Capitol Records Building because it is not intrinsic to the building's architectural design, and it is through the building's architectural design that the building's architectural significance and important associations with the music recording industry are conveyed. Moreover, as demonstrated above, the Project has been designed with generous setbacks and building forms that serve to maintain important views, including views from Vine Street and from the US-101, so that the unique massing, form, and architecture of the Capitol Records Building continues to be a prominent feature of the Hollywood skyline.

After construction of the Project, the Capitol Records Building would remain intact and in its original location. All of its character-defining features, including the rectangular, one-story base and 12-story circular tower, vertical concrete piers, horizontal window bands, concrete awnings, porcelain-enamel sunshades, rooftop metal trylon and concentric ring rooftop sign would remain unchanged and continue to be viewable and discernable by the public. The Capitol Records Building would continue to convey its historic significance and maintain its eligibility for listing as a historical resource. The building's National Register eligibility, its status as a listed California Register resource, and its designation as a Los Angeles Historic-Cultural Monument would not be threatened. **Although the potential for damage due to construction-related vibration and settlement is considered a significant impact, with implementation of mitigation measures during construction, the important character-defining features that convey the significance of the Capitol Records Building as a historical resource would be retained, and its integrity would be preserved; therefore, its existing status as a historical resource would be maintained under the Project or the Project with the East Site Hotel Option and impacts would be less than significant.**

(b) Gogerty Building

The construction of considerable height and density, including high-rise buildings to the south and west of the two-story Gogerty Building, would create a substantial contrast in scale and alter the building's surroundings. The Gogerty Building, however, is separated from the East Site new construction by the Capitol Records Building. The Argyle House located at the southwest corner of Argyle Avenue and Yucca Street (constructed in 2017 and not a historical resource) also separates the Gogerty Building from East Site new construction. Overall, new construction on the East Site would be at least 150 feet from the rear of the Gogerty Building. New construction proposed for the West Site would rise across Vine Street and southwest of the Gogerty Building. Because the Project restricts West Site new

development to mid-block areas to the southwest and west of the Gogerty Building, the new construction would be effectively distanced from the Gogerty Building.

As originally designed, the primary north- and west-facing façades of the Gogerty Building are oriented to the street, with the rear of the building facing south. Due to its modest size and street-facing orientation, the Gogerty Building's historic significance is primarily experienced on an intimate scale, either by sidewalk pedestrians or passing motorists. New construction to the south and across Vine Street to the west would not interrupt or obscure this experience. Overall, for the reasons stated above, alterations to the immediate setting of the Gogerty Building would not materially impair its significance, and impacts in this regard would be less than significant.

Finally, the proposed new construction would include foundation work and the construction of subterranean parking. As discussed above for the Capitol Records Building, because construction at the Project Site would include substantial foundation work and the construction of subterranean parking, there is some potential for damage to the Gogerty Building due to vibration or settlement, which is considered a significant impact.

Although the potential for damage due to construction-related vibration and settlement is considered a significant impact under either the Project or the Project with the East Site Hotel Option, with implementation of mitigation measures during construction, the important character-defining features that convey the significance of the Gogerty Building as a historical resource would be retained, and its integrity would be preserved. Therefore, its existing status as a historical resource would be maintained under the Project or the Project with the East Site Hotel Option, and indirect impacts would be less than significant.

(c) Setting of the Project Site

The Project would be located on surface parking areas and would not have a significant adverse impact on the historic setting that contributes to the eligibility of historical resources on the Project Site or in the immediate vicinity. As discussed above, the Project vicinity was initially improved with low-density residential development in the early 20th Century, and, as the 1920s approached, Vine Street between Hollywood Boulevard and Wilshire Boulevard was widened into a major avenue, with the intersection of Hollywood Boulevard and Vine Street south of the Project Site subsequently becoming a nexus of commercial development, resulting in a collection of buildings punctuating central Hollywood, with a majority clustering at the intersection of Hollywood Boulevard and Vine Street. Theatres were constructed in the vicinity of the Project Site, including the Avalon Hollywood (1926) on Ivar Avenue north of Hollywood Boulevard and the Pantages Theatre (1929) on the northwest corner of Hollywood Boulevard and Argyle Avenue. Widening, grading, and paving of streets spurred development of the commercial

core of Hollywood Boulevard and Vine Street north to include Yucca Street, resulting in the height-limit Yucca–Vine Tower (1928) at the northwest corner of Yucca and Vine Streets. The modest Art Deco two-story Gogerty Building appeared in 1930 at the southeast corner of Yucca Street and Vine Street, and a two-story commercial building was constructed in 1932 on the south side of Yucca Street between Vine Street and Ivar Avenue. The US-101 opened in 1954, making the area more accessible and spurring development, increasing the need for parking. While the Project Site was densely developed by 1950 with small-scale residential development and a few multi-family apartment buildings, by 1955, the residences on the Project Site had been razed for surface parking. Today, only a few remnants of the former residential community remain in the larger Project vicinity, including a bungalow court on Ivar Avenue north of Yucca Street and small pockets of residences east of Argyle Avenue.

The East Site contains only two buildings, the Capitol Records Building and the Gogerty Building. The discussion of the East Site previously provided when discussing indirect impacts to the Capitol Records Building also applies to the Gogerty Building, and may be referenced in Subsection 4.d(1)(b).

The majority of the West Site is also used for surface parking, except for a small, single-story building located at the north end that does not meet the 50-year threshold for evaluation and has not been surveyed previously. Further detail regarding the setting of the Project Site is provided in Chapter III, *Environmental Setting*, of this Draft EIR.

As described above, the majority of the existing historic setting in the Project vicinity is clustered south of the Project Site around the Hollywood Boulevard and Vine Street intersection, particularly within the Hollywood Boulevard Commercial and Entertainment District. Moreover, the parcel containing the Manor on Vine building at 1718 Vine Street (located outside District boundary and not a historical resource) sits between the East Site and the Guaranty Building at 6331 Hollywood Boulevard, a contributing building located west of the Pantages Theatre, another contributing building. The 1718 Vine Street parcel effectively separates new construction from the Hollywood Boulevard Commercial and Entertainment District by approximately 80 feet. The historic setting that contributes to the eligibility of the Hollywood Boulevard Commercial and Entertainment District is largely contained within and experienced from inside the Hollywood Boulevard Commercial and Entertainment District. Adding considerable height and mass north of the Hollywood Boulevard Commercial and Entertainment District and outside of its boundaries would not adversely affect the setting of the Hollywood Boulevard Commercial and Entertainment District such that its listing in the National Register would be threatened. The Project would introduce two new high-rise buildings onto the parking areas on the Project Site, and these high-rise buildings would be partially visible in the background behind the Hollywood Boulevard Commercial and Entertainment District when viewed from the south

from the Hollywood Boulevard and Vine Street intersection north to the Capitol Records Building and the Project Site. When viewed along the main north-south and east-west corridors along Vine Street and Yucca Street, respectively, the Capitol Records Building would remain visually prominent, and existing views of the primary façades of the Gogerty Building, the commercial buildings along Yucca Street, and the Art Deco Yucca–Vine Tower would still remain. **In summary, the Project and the Project with the East Site Hotel Option would not materially impair the historic setting of historical resources on the Project Site or in the Project vicinity. Therefore, indirect impacts on historical resources would be less than significant in regard to the historic setting.**

(ii) Historical Resources Adjacent to the Project Site

This section analyzes the potential for indirect impacts to historical resources located adjacent to, but not on, the Project Site, including the Hollywood Walk of Fame; Pantages Theatre, located at 6233 Hollywood Boulevard; Avalon Hollywood at 1735 N. Vine Street; and the Art Deco commercial building at 6316-6324 Yucca Street.

(a) The Hollywood Walk of Fame

As indicated above under the discussion of direct impacts to the Hollywood Walk of Fame, potential construction impacts are considered significant; however, through compliance with the Walk of Fame Guidelines and implementation of Mitigation Measure CUL-MM-1, which specifies procedures and requirements for the removal, storage, reinstallation and restoration of portions of the Hollywood Walk of Fame, its eligibility as a Historic-Cultural Monument and for listing in the National Register would be maintained. However, in addition to the significant direct impacts to the Hollywood Walk of Fame associated with potential damage from heavy equipment and sidewalk improvements, there also would be potential for significant indirect impacts due to construction vibration associated with proximate excavation, building foundation and demolition activities. These indirect impacts also are considered significant and would also be addressed through compliance with the Walk of Fame Guidelines and implementation of a Mitigation Measure CUL-MM-1.

In addition to construction vibration, other indirect impacts to the Hollywood Walk of Fame's integrity could occur due to changes associated with the Project that would affect its *setting.* The setting of the portion of the Hollywood Walk of Fame that is adjacent to the Project Site would change with the construction of the new buildings and associated plazas and landscaped areas. However, the larger setting of the Hollywood Walk of Fame would remain largely unaffected as the character of its setting is largely defined by buildings, landscaped planters, fencing, and parking lots on one side, and an asphalt roadway on the other. This setting would remain essentially unchanged with the Project, with the exception of the

removal of five existing curb cuts. Although elimination of these curb cuts would alter the current setting of the Hollywood Walk of Fame, these changes would improve and help restore continuity to the Hollywood Walk of Fame as a continuous element oriented towards pedestrians, by reducing vehicle conflicts and interference with pedestrian activity at these junctures. Therefore, the Hollywood Walk of Fame would retain its integrity of setting after construction of the Project and would continue to convey its historical significance as a decorative sidewalk oriented towards pedestrian circulation.

Despite substantial new construction immediately east and west of the Hollywood Walk of Fame, all relevant aspects of its integrity would be retained. While the Project would alter the immediate surroundings, this alteration would not materially impair the Hollywood Walk of Fame such that it would no longer convey its historic significance.

Although the potential for indirect impacts to the Hollywood Walk of Fame due to vibration or settlement during construction are considered potentially significant for the Project and the Project with the East Site Hotel Option, following compliance with the Hollywood Walk of Fame Guidelines and implementation of Mitigation Measure CUL-MM-1, the Hollywood Walk of Fame's integrity and significance as a historical resource would be retained, and impacts would be less than significant.

(b) Pantages Theatre

The Pantages Theatre, which is a district contributor to the Hollywood Boulevard Commercial and Entertainment District, is located immediately adjacent to the East Site. The Pantages Theatre property is separated from the East Site along portions of its western side lot line by a shared 20-foot-wide public alley. This alley provides both a physical and visual separation between the Project Site and the Pantages Theatre. Along other portions of the western side lot-line and northern rear lot line the two sites abut directly. Where such conditions exist, the Project would follow typical standards for party wall conditions and setbacks such that it would maintain physical and seismic isolation between the Pantages Theatre building.

Although there would be limited areas where the Project would be in close proximity, nearly all of the aspects of integrity for the Pantages Theatre would be retained and remain intact. Close-up views of the front façade of the Pantages Theatre would not be affected by the Project, although more distant views of the front façade would feature the Project as a backdrop to the Pantages Theatre, as further discussed. However, the Pantages Theatre's *location*, *design*, *materials*, and *workmanship* would remain completely intact as the Project would not physically touch the resource. Its *feeling* and *association* would also remain intact as the front façade is the most architecturally articulated of all of the building's elevations and the elevation that most conveys the building's feeling and association—from the exterior—as a historical theatre. Moreover, the Project

would be located to the rear of the resource and set apart from it by an alley. Therefore, the primary façade of the Pantages Theatre—which fronts onto Hollywood Boulevard—would retain its visual prominence upon the street.

The only views of the Pantages Theatre that would be obscured by the Project include a view of the building's rear and west elevations; however, the rear and west elevations of the Pantages. Theatre are the building's least significant elevations, as they are not articulated architecturally and would still be viewable from the alley (see **Figure IV.C-2**, *Rear Elevation of the Pantages Theatre*) and along Vine Street. However, these views, whether blocked from a distance or still accessible from the alley and Vine Street, are not the primary view that helps the building convey its significance. Therefore, the building would retain its integrity in terms of both feeling and association. The only aspect of the Pantages Theatre's integrity that would be affected by the Project is its *setting*. When the Pantages Theatre is viewed from its primary façade—the most significant one—the Project would be visible in the background. The Pantages Theatre is a building with relatively low massing, so the Project, being located to the rear of the building, would create a new spatial relationship in which a viewer from the street would now perceive the front elevation of the Pantages Theatre as set against a backdrop of a much larger building. However, the Pantages Theatre's setting is characterized by exactly such juxtapositions in height between buildings, as development in Hollywood has been characterized by this pattern since the late 1950s, when the prevailing height limit of 150 feet was removed. Therefore, the setting for the Pantages Theatre would somewhat change because of its new relationship to its surroundings in that the Project, which is much larger in scale, would now form a backdrop to the Pantages Theatre; whereas, presently, the sky is the backdrop to the building. However, due to development patterns already present in Hollywood since the late 1950s, this change in the setting and the partial alteration of visual access to the non-articulated rear and west elevations, would not be considered significant.

However, because construction at the Project site would include substantial foundation work and the construction of subterranean parking, there is potential for these activities to cause damage to the Pantages Theater through vibration or settlement due to the building's close proximity to the Project Site. As is common in similar urban development sites, vibration and settlement would be controlled through adherence to design values prescribed by the shoring engineer and geotechnical engineer with the intent to prevent damage to adjacent structures, and through monitoring of associated construction activities. Although steps would be taken during construction to help ensure design values are not exceeded, if exceedance were to occur and to result in structural damage, based on industry practice and knowledge of construction activities in similar settings such damage would likely be surficial and repairable. Nonetheless, the potential for damage to the Pantages Theatre due to construction related vibration and settlement is considered a significant impact.

Figure IV.C-2, Rear Elevation of the Pantages Theatre

After construction of the Project or the Project with the East Site Hotel Option, the Pantages Theatre would remain intact and continue to convey its historic significance. Moreover, the significance and integrity of the Pantages Theatre would not be materially impaired by alterations to its surroundings caused by the Project or the Project with the East Site Hotel Option. However, due to potential for structural damage due to construction vibration and settlement, impacts on the Pantages Theatre are potentially significant and mitigation measures are proposed.

(c) Avalon Hollywood

The West Site is bordered by the Avalon Hollywood at Vine Street. New construction on the West Site is set back 17.5 feet from the north property line of the Avalon Hollywood. New construction would also be set back 15 feet from Vine Street north of the Avalon Hollywood to maintain the prominence of the Avalon Hollywood façade on Vine Street. In this manner, the Project provides a visual separation between the Project and the Avalon Hollywood, which is the closest Hollywood Boulevard Commercial and Entertainment District contributor to the West Site. Because of the strong physical and visual separation of the Project Site to the north of the Avalon Hollywood, as well as the setback of the Project Site from Vine Street, nearly all of the aspects of integrity for the Avalon Hollywood would be retained and remain intact and primary views of the building's primary façade would not be affected. Its *location*, *design*, *materials*, and *workmanship* would remain completely intact as the Project does not

physically touch the resource. Its *feeling* and *association* would also remain intact as the front façade is the most architecturally articulated of all of the building's elevations and the elevation that most conveys the building's feeling and association—from the exterior—as a historical theater. Moreover, the north (side) elevation of the Avalon Hollywood—which is the only other façade that is readily visible to the public and is very minimally articulated in terms of its architecture, would also remain visible to the public due to the 17.5-foot setback from the theater's north property line (see **Figure IV.C-3**, *North (Side) Elevation of the Avalon Hollywood*).

Figure IV.C-3, North (Side) Elevation of the Avalon Hollywood

Furthermore, the Project would enhance the continuity of the street-line on this block of Vine Street which is characterized by buildings set in close proximity to one another. Many buildings on this block, in fact, are so close to one another that they share a party wall, as does the Avalon Hollywood with the building located to the south of it. The manner in which the street-facing façade of the new construction would be set back from both Vine Street and the primary façade of the Avalon Hollywood would allow it to maintain a presence in regard to the continuity of the street-line while also playing a respectful role in regard to the main façade of the Avalon Hollywood, which has long held a dominant and commanding presence on the street.

The only view of the Avalon Hollywood that would be partially obscured by the Project is a far-distant view of the building's north (side) elevation; however, the north (side) elevation of the Avalon Hollywood is not a particularly significant one, as it is fairly unarticulated architecturally and very utilitarian. The two-story portion of the building that occurs towards the street has windows, a covered entry, and a second floor balcony that are intended to be viewed from the street. However, the higher massed portions of the building beyond the lower two-story portion enclose the interior of the theatre space as well as back-of-house spaces. This portion of the building was essentially designed as a big box, and any openings or features to the exterior, such as an exterior egress stair, are strictly functional and designed in such a way that they are not intended to call attention to themselves. Instead of being designed to be visible as decorative elements, they are placed on the exterior because they are necessary to a functioning theatre space, and the minimal articulation of these elements is intended to make them blend into the background rather than to visually call attention to themselves. The lower portion of the building that fronts the street would still be viewable within close range of the building from the space created between the Project Site by the setback to the north of the theater's property line, while the portion of the building that has a higher massing and was never intended to be highly visible will be largely obscured by the Project. Regardless, this view of the side elevation—whether blocked from a distance or unblocked from the space created by the setback—is not the primary view that helps the building to convey its significance, which is the front elevation. Therefore, the building would retain its integrity in terms of both feeling and association.

The only aspect of the Avalon Hollywood's integrity that would be affected by the Project is its *setting*.

When the Avalon Hollywood is viewed from its primary façade—the most significant one—the Project would be visible in the space adjacent to it, which is currently a parking lot, to the north. However, while the Avalon Hollywood's relationship to the Project, would be new, the building's larger setting has been characterized by the juxtaposition of varying building heights \ since the late 1950s, when the prevailing height limit of 150 feet was removed. Moreover, as previously stated, the Project would enhance the continuity of the street-line on the west side of Vine Street, echoing a pattern of development that is already established by the neighboring two buildings to the south. Therefore, the setting for the Avalon Hollywood would somewhat change because of its new relationship to the Project, but not significantly. This is because, as stated, the larger setting of the Avalon Hollywood is already characterized by the juxtaposition of varying building heights between the buildings of which it is comprised.

However, as discussed above for the Pantages Theatre, because construction at the Project Site would include substantial foundation work and the construction of subterranean parking, there is potential for these activities to cause damage to the Avalon Hollywood through vibration or settlement, due to the building's close

proximity to the Project Site. Accordingly, the potential for damage to the Avalon Hollywood due to construction related vibration and settlement is considered a significant impact.

After construction of the Project or the Project with the East Site Hotel Option, the Avalon Hollywood would remain intact and continue to convey its historic significance. Moreover, the significance and integrity of the Avalon Hollywood would not be materially impaired by alterations to its surroundings caused by the Project or the Project with the East Site Hotel Option. However, due to potential for structural damage due to construction vibration and settlement, impacts on the Avalon Hollywood are potentially significant and mitigation measures are proposed.

(d) Art Deco Commercial Building/6316-6324 Yucca Street

The commercial building at 6316-24 Yucca Street is significant as an excellent example of a low-rise, multiple storefront commercial building from the 1930s. The building's historic significance is conveyed through its largely intact storefronts and distinctive Art Deco detailing. Characteristic of commercial buildings from the period, architectural articulation is confined to the street-facing (north) façade. Retaining clear sightlines to this façade from Yucca Street is critical to retaining the building's significance.

New construction proposed for the West Site would be located south and east of the commercial building at 6316-6324 Yucca Street. Currently occupied by surface parking and a small one-story commercial building, these areas face the utilitarian rear and side façades of the commercial building. Therefore, the Project would not block important street views of the building from Yucca Street. The 11-story West Senior Building would be constructed immediately west facing Yucca Street. Ground-floor retail would continue the street-facing retail along Yucca Street represented by the commercial building at 6316-6324 Yucca Street. Above the first floor, the West Senior Building would be set back 16 feet to the west, so that the majority of the building's volume is further distanced from the commercial building at 6316-6324 Yucca Street. The 35-story West Building would be constructed to the south, approximately 60 feet from the rear façade of the commercial building at 6316-6324 Yucca Street.

Due to its modest size and street-facing orientation, the historic significance of the commercial building at 6316-6324 Yucca Street is primarily experienced on an intimate scale, either by pedestrians or passing motorists. The increased density constructed to the south and west would not obscure the building's important Yucca Street façade, which would remain unobstructed from view after implementation of the Project. Moreover, the large surface parking areas to the west and south do not represent setting features that are character-defining or important to the building's historic significance.

The Project would not affect the integrity of *location, design, materials, or workmanship* of the commercial building at 6316-6324 Yucca Street. The building would remain intact in its current location and would not be materially altered by new construction in its immediate surroundings. Therefore, integrity of *feeling* would also remain unaffected because all the existing physical elements that characterize the commercial building at 6316-6324 Yucca Street would continue to convey the property's historic significance. Because the commercial building at 6316-6324 Yucca Street would retain integrity of *location, design, materials, workmanship*, and *feeling*, it would continue to reflect its historic significance as an intact commercial building from the 1930s; therefore, integrity of *association* would also remain unaffected by the Project. The only aspect of integrity that could potentially be affected by the Project is *setting*. Setting features important to the commercial building at 6316-6324 Yucca Street are limited to the configuration of street and sidewalk fronting the building's north-facing façade, which would remain unchanged by the Project. The existing urban fabric to the north, which includes the 1928 Yucca-Vine Tower at 6305 Yucca Street and an intact grouping of multi-family residential buildings from the 1920s clustered around Ivar Avenue north of Yucca Street, would remain unchanged by the Project. The surface parking lots at the rear of the commercial building at 6316-6324 Yucca Street are not an important aspect of its surroundings.

Because the Project would add considerable height and mass to nearby areas largely occupied by surface parking, the immediate surroundings of the commercial building at 6316-6324 Yucca Street would be altered by the Project. Despite this alteration, all of the aspects of integrity would be unaffected by the Project, so that the historic integrity of the commercial building at 6316-6324 Yucca Street would be retained. After construction of the Project, the commercial building at 6316-6324 Yucca Street would remain intact and continue to convey its historic significance. For these reasons, the significance and integrity of 6316-6324 Yucca Street would not be materially impaired by alterations to its surroundings caused by the Project.

However, as discussed above for the Pantages Theatre and Avalon Hollywood, because construction at the Project Site would include substantial foundation work and the construction of subterranean parking, there is potential for these activities to cause damage to the commercial building at 6316-6324 Yucca Street through vibration or settlement, which is considered a significant impact.

After construction of the Project or the Project with the East Site Hotel Option, the commercial building at 6316-6324 Yucca Street would remain intact and continue to convey its historic significance. Moreover, the significance and integrity of the commercial building at 6316-6324 Yucca Street would not be materially impaired by alterations to its surroundings caused by the Project or the Project with the East Site Hotel Option. However, due to potential for structural damage due to construction vibration and settlement, impacts on the commercial building at 6316-6324 Yucca Street are potentially significant, and mitigation measures are proposed.

(iii) Historical Resources in the Vicinity of the Project Site

This section analyzes the potential for indirect impacts to historical resources located in the vicinity of the Project Site, which does not include the historical resources adjacent to the Project Site that are addressed above. Historical resources in the vicinity of the Project Site are physically separated from it by a significant distance in comparison to those historical resources that are immediately adjacent to the Project Site. Therefore, they would not be directly or physically impacted by the Project. The only potential indirect impact to historical resources in the vicinity of the Project Site is with respect to changes in views due to implementation of the Project and potential effects on the setting, feeling, and association of these historical resources. Therefore, the following discussion presents the indirect impacts to the Hollywood Boulevard Commercial and Entertainment District, as well as to other historical resources in the vicinity of the Project Site, with respect to existing views that may be potentially altered by the Project. While the Hollywood Boulevard Commercial and Entertainment District is described in detail, the potential for indirect effects on other historical resources in the vicinity of the Project Site are analyzed in a tabular format in **Table IV.C-5,** *Summary of View Analysis for Identified Historical Resources in Project Vicinity*.

(a) Hollywood Boulevard Commercial and Entertainment District

The Hollywood Boulevard Commercial and Entertainment District is significant as an intact grouping of properties associated with Hollywood Boulevard's status as an important commercial and entertainment corridor during Hollywood's heyday in the first half of the 20th Century. The Hollywood Boulevard Commercial and Entertainment District is composed of a variety of property types and architectural styles lining a commercial boulevard. Taller buildings (from four to thirteen floors) are normally located at corners with one- and two-story buildings located in between. Characteristic of pre-World War II commercial areas, the Hollywood Boulevard Commercial and Entertainment District is scaled to the pedestrian. Contributing properties to the Hollywood Boulevard Commercial and Entertainment District are oriented toward the street with architectural articulation largely confined to street-facing façades. The Hollywood Boulevard Commercial and Entertainment District's historic significance is experienced primarily from the street either by pedestrians or by motorists in passing vehicles. The Project Site is north of the Hollywood Boulevard Commercial and Entertainment District's easternmost blocks, which include the important intersection of Hollywood Boulevard and Vine Street. Several of the Hollywood Boulevard Commercial and Entertainment District's important contributing properties are located near this intersection. The Project Site is located outside the Hollywood Boulevard Commercial and Entertainment District and new construction would remain outside of the Hollywood Boulevard Commercial and Entertainment District boundaries.

TABLE IV.C-5
SUMMARY OF VIEW ANALYSIS FOR IDENTIFIED HISTORICAL RESOURCES IN PROJECT VICINITY

Map #	Resource	Views	Impact
Indirect Impacts from View Alteration			
3	Former Site of the Little Country Church of Hollywood	Direct view of Project Site looking west.	No impact. The building was destroyed by fire in 2008 and the primary feature of the historical resource is no longer extant and only the landscape remains. The landscape would not be affected.
4	St. Stephen's Episcopal Church	No direct views of the Project Site looking west.	No impact as there are no direct or partial views of the Project Site. The resource is physically separated from the Project Site by the Argyle House, and the Project Site is not visible from Yucca Street.
5	Fonda Theatre/ Music Box Theatre	Distant limited view of Project Site looking northwest, from over 1.5 blocks away. Separated from the Project Site by other intervening buildings.	No impact. The Fonda Theater is oriented north and distant partial views to the northwest would not result in a substantial material change to the integrity of the Fonda Theater as the building's setting is characterized by its low massing in comparison to larger, taller buildings in the surrounding area as development in Hollywood has been characterized by such juxtapositions since the late 1950s when the prevailing height limit of 150 feet was removed.
6	Vine Theatre	No direct view of Project Site.	No impact. The Vine Theatre is a one-story building oriented south. Any potential view is currently obscured by taller building to the north and east.
7	Two-story commercial building (1723 Ivar Ave.)	Partial view of West site looking northeast.	Less than Significant. The Project would be located to the northeast of the historical resource. The building is oriented east with a view of the substantially taller Knickerbocker Hotel directly across the street from the Project Site so that only partial views of the West Site would be possible. The change in the indirect, partial view towards the West Site would not result in a substantial material change to the integrity of 1723 Ivar Avenue as the historical resource's immediate setting is characterized by contrasting building heights in the surrounding area that have been in existence since the late 1950s, when the prevailing height limit of 150 feet was removed.

TABLE IV.C-5
SUMMARY OF VIEW ANALYSIS FOR IDENTIFIED HISTORICAL RESOURCES IN PROJECT VICINITY

Map #	Resource	Views	Impact
8	Hollywood-Ivar Building	Partial view of Project Site looking east and northeast.	Less than significant. The Project would be to the northeast of the historical resource. Direct views of the one-story building that is currently directly across the street from the historical resource would be maintained, while new partial views of the Project Site to the northeast would be introduced. However, the historical resource's immediate setting is characterized by juxtapositions in adjacent building heights in the surrounding area since the late 1950s, when the prevailing height limit of 150 feet was removed. The change in the partial view towards the Project Site would not result in a substantial material change to the integrity of the Hollywood-Ivar Building.
10	Yucca-Vine Tower	Direct view of Project Site looking south and southeast.	Less than significant. The historical resource faces south onto Yucca Street and, therefore, has direct views of the Project Site. The Project would alter views looking south and southeast. However, current south and southeast views are not an important aspect of the historical resource's immediate setting or critical to the architectural significance of the Yucca-Vine Tower. Moreover, the historical resource's larger setting is characterized by juxtapositions in adjacent building heights in the surrounding area since the late 1950s, when the prevailing height limit of 150 feet was removed in Hollywood. Change in view would not result in a substantial material change to the integrity of the Yucca-Vine Tower.
A.9	Chateau Alto Nido	Partial views of the Project Site to the southeast.	Less than significant. Project would interrupt some views looking southeast. Views from primary east- and north-facing façades would remain. Views to the southeast are not critical to the architectural significance of the Chateau Alto Nido or its association with multi-family residential development in Hollywood. Change in view would not result in a substantial material change to the integrity of the Chateau Alto Nido or to the North Hollywood Multi-Family Residential District.
A.10	St. Elmo Apartments	No direct view of Project Site.	No impact. The historical resource is oriented north and the Project Site would not be visible from the ground floor or primary facade along Yucca Street.

TABLE IV.C-5
SUMMARY OF VIEW ANALYSIS FOR IDENTIFIED HISTORICAL RESOURCES IN PROJECT VICINITY

Map #	Resource	Views	Impact
A.11	Halifax Apartments	No direct view of Project Site.	No impact. The historical resource is oriented north and the Project Site would not be visible from the ground floor or primary facade along Yucca Street.
A.12	1817 Ivar Ave.	Partial view of Project Site looking southeast.	Less than significant. Distant views of the Project Site would not result in a substantial material change to the integrity of the apartment building at 1817 Ivar Avenue or the Hollywood Boulevard Commercial and Entertainment District.
B.2	Hollywood Equitable Building	Partial view of Project Site looking north and northwest.	Less than significant. The Hollywood Equitable Building is oriented to the south towards Hollywood Boulevard and west towards Vine Street. The Project would block only views looking north and northwest from the north and west sides of the Hollywood Equitable Building. Blocking north and northwest views would not result in a substantial material change to the integrity of the Hollywood Equitable Building or the Hollywood Boulevard Commercial and Entertainment District as its immediate setting would remain intact, and the larger setting (the setting of the larger Hollywood area that extends beyond the bounds of the Hollywood Boulevard Commercial and Entertainment District) is characterized by juxtapositions in adjacent building heights in the surrounding area since the late 1950s, when the prevailing height limit of 150 feet was removed.
B.4	Knickerbocker Hotel	No direct view of Project Site	No impact. The historical resource is oriented west and the Project Site, located north and northeast, would not be visible from the ground floor or primary facade along Ivar Avenue.
B.5	Guaranty Building (L. Ron Hubbard Life Exhibition Building)	No direct view of Project Site.	No impact. The historical resource is oriented west and the Project Site would not be visible from the ground floor or primary facade along Ivar Avenue.
B.6	Regal Shoe Store	Possible limited partial views of Project Site looking northeast.	No impact. The Building is oriented towards both the south and east. However, any potential views of the Project Site, which are to the east, are blocked by the Guaranty Building, which is located directly across the street on Cahuenga Boulevard as it is a taller building.

TABLE IV.C-5
SUMMARY OF VIEW ANALYSIS FOR IDENTIFIED HISTORICAL RESOURCES IN PROJECT VICINITY

Map #	Resource	Views	Impact
B.7	Security Trust and Savings Building	Limited views of the Project Site to the northeast.	Less than significant. Distant views of large buildings outside the Hollywood Boulevard Commercial and Entertainment District would not result in a substantial material change to the integrity of the Security Trust and Savings Building or the Hollywood Boulevard Commercial and Entertainment District.
B.8	Owl Drug Company; Julian Medical Building	Indirect and distant Views of Project Site looking northeast	Less than significant. Distant views of large buildings outside the Hollywood Boulevard Commercial and Entertainment District would not result in a substantial material change to the integrity of the Hollywood Boulevard Commercial and Entertainment District.
B.9	Palmer Building	Indirect and distant views of Project Site looking northeast.	Less than significant. Distant views of large buildings outside the Hollywood Boulevard Commercial and Entertainment District would not result in a substantial material change to the integrity of the Hollywood Boulevard Commercial and Entertainment District.
B.10	Leed's	Indirect and distant Views of Project Site looking northeast.	Less than significant. Views of large buildings outside the Hollywood Boulevard Commercial and Entertainment District would not result in a substantial material change to the integrity of the Hollywood Boulevard Commercial and Entertainment District, as the Hollywood Boulevard Commercial and Entertainment District's immediate setting would remain intact, and the larger setting (the setting of the larger Hollywood area that extends beyond the bounds of the Hollywood Boulevard Commercial and Entertainment District) is characterized by juxtapositions in adjacent building heights in the surrounding area since the late 1950s, when the prevailing height limit of 150 feet was removed. In addition to the immediate setting remaining intact in regard to views of the Project Site, all of the remaining aspects of integrity (location, design, workmanship, feeling, and association) would remain intact.
B.11	Regency Building	Indirect and distant Views of Project Site looking north and northeast.	Less than significant. Distant views of the Project Site would not result in a substantial material change to the integrity of the Regency Building or the Hollywood Boulevard Commercial and Entertainment District.

TABLE IV.C-5
SUMMARY OF VIEW ANALYSIS FOR IDENTIFIED HISTORICAL RESOURCES IN PROJECT VICINITY

Map #	Resource	Views	Impact
Historic Districts Located Within the Area of Potential Impact			
A	Hollywood North Multi-Family Residential Historic District	Views looking south and southeast.	Less than significant. The Project would alter views looking south and southeast. Current views to the south and southeast are not critical to the Hollywood North Multi-Family Residential Historic District's associations with early pre-World War II multi-family residential development in Hollywood. Change in views would not result in a substantial material change to the integrity of the North Hollywood Multi-Family Residential Historic District.
C	Vista del Mar/ Carlos District	Views looking west.	Less than significant. The Project would alter views looking west. Current views to the west are not critical to the Vista del Mar/Carlos District's associations with early residential development in Hollywood. Change in views would not result in a substantial material change to the integrity of the Vista del Mar/Carlos District.

SOURCE: Historic Resources Technical Report, March 2020. Provided in Appendix F-1 of this Draft EIR.

The Project would construct a 46-story East Building and an 11-story East Senior Building on the East Site and a 35-story West Building and up to an 11-story West Senior Building on the West Site (nine stories for the Project with the East Site Hotel Option), north of the eastern end of the Hollywood Boulevard Commercial and Entertainment. The two high-rise buildings would be substantially taller than any existing building located within Hollywood Boulevard Commercial and Entertainment District. Both high-rise buildings would be intermittently visible looking north from Hollywood Boulevard and its cross-streets within the Hollywood Boulevard Commercial and Entertainment District. Together, the two high-rise buildings would introduce prominent new skyline elements as a backdrop to more modest building heights within in the Hollywood Boulevard Commercial and Entertainment District. The effect is demonstrated in Figure IV.A-12, in Section IV.A, *Aesthetics*, of this Draft EIR. Also, see Figure II-26, *Simulated Elevated View from the North*, in Chapter II, *Project Description*, of this Draft EIR.

Despite introducing substantial new height to the skyline looking north, the proposed new construction would not result in significant adverse effects to the Hollywood Boulevard Commercial and Entertainment District. This is because the immediate setting of the Hollywood Boulevard Commercial and Entertainment District would not be altered, and the area surrounding the Hollywood Boulevard Commercial and Entertainment District has been characterized by juxtapositions between building heights since the prevailing height limit of 150 feet was removed in Hollywood in the late 1950s. Features important to the significance of the Hollywood Boulevard Commercial and Entertainment District are largely contained within and are best experienced within the Hollywood Boulevard Commercial and Entertainment District. The new construction associated with the Project would not interrupt the configuration of buildings, their spatial relationships to each other, or their relationship to the street that characterize the Hollywood Boulevard Commercial and Entertainment District as it is experienced. The pattern of tightly spaced buildings scaled to the pedestrian, a critical element of pre-World War II commercial districts, would remain intact and uninterrupted.

In addition, the siting, building forms and exterior appearance of the two high-rise buildings are aspects of the Project design that are intended to extend and reinforce the existing urban pattern and context established within the Hollywood Boulevard Commercial and Entertainment District. While the façades of the West and East Buildings facing the Capitol Records Building and the Hollywood Hills have been designed to curve softly to maximize the width of view corridors into and through the Project Site, the remaining façades, which face south towards Hollywood Boulevard, adopt the rectilinear language of the older historic buildings (see Figure II-26, in Chapter II, *Project Description*, and Figure IV.A-12, in Section IV.A, *Aesthetics*, of this EIR). The Project's two Senior Buildings also are designed to reinforce the Hollywood Boulevard Commercial and Entertainment District context. Their sizes (each at 11 stories, or nine stories on the East Site under the

Project with the East Site Hotel Option) reflect the standard heights of the historic buildings clustered near Hollywood Boulevard and Vine Street.

Despite substantial new construction located immediately to the north, all but one of the seven aspects of integrity would be unaffected by the Project. The Project would not affect the integrity of *location, design, materials, or workmanship* for the Hollywood Boulevard Commercial and Entertainment District or any of its component contributing buildings. These resources would remain intact in their current locations and would not be materially altered by new construction associated with the Project. Therefore, integrity of *feeling* would also remain unaffected because all the existing physical elements that characterize the Hollywood Boulevard Commercial and Entertainment District and contributing buildings would remain and continue to convey their historic significance. Because all the important physical characteristics of the Hollywood Boulevard Commercial and Entertainment District would remain, they would continue to reflect their important associations with the commercial development of Hollywood prior to World War II; therefore, integrity of *association* would also remain unaffected by the Project. The only aspect of integrity that could possibly be affected by the Project is *setting*. However, this alteration would not materially impair these resources in a manner that they would no longer be able to convey their historic significance.

Setting features important to the Hollywood Boulevard Commercial and Entertainment District include the following: the configuration of streets and sidewalks fronting the Hollywood Boulevard Commercial and Entertainment District buildings, the pattern of tightly spaced buildings defining a linear commercial corridor, and the public circulation space delineated by a uniform building street wall. Since setting features are largely contained within the Hollywood Boulevard Commercial and Entertainment District and its immediate setting would not be altered, new background skyline elements would not adversely affect the setting of the Hollywood Boulevard Commercial and Entertainment District such that its listing on the National Register would be threatened. Moreover, the area surrounding the Hollywood Boulevard Commercial and Entertainment District is already characterized by juxtapositions between building heights.

The Project has been designed to maintain a clear separation at the ground level between the Hollywood Boulevard Commercial and Entertainment District boundary and new construction on the Project Site so that the distinctive urban form of the Hollywood Boulevard Commercial and Entertainment District would be maintained and the individual contributing buildings that border the new construction would continue to be understood as contributors.

Because the contributing and non-contributing buildings that comprise the Hollywood Boulevard Commercial and Entertainment District are merely in the

vicinity of the Project Site and not directly adjacent to it—with the exception of two contributing buildings, the Pantages Theatre and the Avalon Hollywood, which are analyzed with respect to indirect impacts in sections above—they do not have an especially close proximity to the Project Site. Due the separation in space and distance between the buildings that comprise the Hollywood Boulevard Commercial and Entertainment District and the Project Site, indirect impacts due to construction and vibration would not be applicable. Therefore, no mitigation measure for potential vibration is necessary with regard to the buildings that comprise the Hollywood Boulevard Commercial and Entertainment District, with the exception of the three adjacent resources previously noted. **The significance and integrity of the Hollywood Commercial and Entertainment Historic District would not be materially impaired by alterations to its surroundings caused by the Project or the Project with the East Site Hotel Option, and the overall integrity of the Hollywood Boulevard Commercial and Entertainment District would remain intact. Therefore, the Project or the Project with the East Site Hotel Option would not have a significant impact on the Hollywood Boulevard Commercial and Entertainment District.**

(b) Other Historical Resources in the Vicinity of the Project Site

All additional historical resources not subject to analysis above are physically separated from the Project Site by other buildings, streets, or distance. In this section, indirect impacts to these other historical resources in the vicinity of the Project Site are analyzed to determine if the Project would result in a substantial material change to the integrity and significance of historical resources within the Project vicinity. As previously stated, the Project would not result in any direct impacts to these resources. While separated a relatively significant distance away from the Project Site in comparison to those historical resources that are immediately adjacent to it, the possibility exists for the majority of these historical resources in the vicinity of the Project Site to have views of it. Therefore, these possible views were analyzed for their potential to indirectly impact these historical resources. Possible views could be direct views of the Project Site from a primary façade of the historical resource, which could potentially impact the integrity of the historical resource in terms of setting, feeling, and association. Other possible views could be partial views of the Project Site from a secondary (side) or even tertiary (rear) elevation of the historical resource; as analyzed in this section for the Project, these possible views are not considered to indirectly impact the historical resource's integrity in terms of setting, feeling, and association, given both that these elevations are not as important as the primary façade—which is the most public of the façades—and the distance between these historical resources and the Project Site. The results of this analysis are summarized in Table IV.C-5. Also, see the analysis of visual character and quality in Section IV.A, *Aesthetics*, of this Draft EIR.

As previously described, the historical resources in the vicinity of the Project Site are located at a significant distance from the Project Site relative to the historical resources immediately adjacent to it; this distance ranges from as little as 0.03 miles for the nearest resources to as much as 0.25 miles for the most distant resources. Because of their distance and intervening urban development that physically separates them from the Project Site, the Project does not have the ability to materially impair these resources. Instead, as described above, all potential indirect impacts to historical resources in the Project vicinity are with respect to possible views of the Project Site; however, as analyzed in Table IV.C-5, Project impacts to all of these possible views from historical resources in the vicinity of the Project Site would be either "no impact" or "less than significant." **Therefore, indirect impacts are less than significant because the Project and the Project with the East Site Hotel Option would not materially impair any of these resources or interrupt primary views of these resources in a manner that would adversely affect the ability of these historical resources to convey their significance. At the conclusion of the Project or the Project with the East Site Hotel Option, the significance and integrity of other historical resources in the vicinity of the Project Site would remain intact.**

(2) Mitigation Measures

The following mitigation measures are proposed to reduce potential impacts on historical resources associated with the Project. It should be noted for clarification that Mitigation Measure NOI-MM-4, provided in Section IV.I, *Noise*, of this EIR, which addresses structural vibration, includes reference to historical, as well as non-historical, buildings that require vibration monitoring. Furthermore, as discussed below under the *Level of Significance After Mitigation* subheading, Mitigation Measure NOI-MM-4 and Mitigation Measure CUL-MM-2, where they apply to off-site historical resources, require the consent of other property owners who may not agree to implement the mitigation measures.

- **CUL-MM-1:** Prior to any disturbance to the Hollywood Walk of Fame, a City of Los Angeles designated Historic-Cultural Monument, the Applicant shall contact the Hollywood Chamber of Commerce/Hollywood Historic Trust (Chamber/Trust) directly via letter detailing the location of the Project Site, its potential impact on the Hollywood Walk of Fame, Project timeframe, list of affected stars and surrounding sidewalk area, proposed procedures for removal of stars, where and for how long the stars would be stored, how they would be secured, and other relevant details. The Chamber/Trust would reply via letter with the required procedures related to alterations to the Hollywood Walk of Fame and a list of contractors approved for such work. Additionally, the Chamber/Trust would request a formal in-person meeting between the Applicant, Chamber/Trust officials, and staff from the Office of Historic Resources and Department of Public Works Bureau of Engineering to discuss the process in greater depth. Written correspondence to the Chamber/Trust shall be sent to the address that follows: Hollywood Chamber of Commerce,

6255 Sunset Boulevard, Suite 150, Hollywood, CA 90028. Accepting that specific details for removal, storage and, replacement of affected stars and terrazzo shall be determined through coordination with the Chamber/Trust, the following general procedures shall be implemented:

- Photographic and documentary recordation of the location of each Hollywood Walk of Fame star potentially impacted by project construction shall be completed by a qualified architectural historian meeting the Secretary of the Interior's Professional Qualification Standards for Architectural History;
- Prior to any construction or demolition activities that have the potential to damage the sidewalk along Vine Street, each section of sidewalk containing a star that cannot be reasonably protected in place shall be cut and carefully removed [by a qualified restoration contractor] within its respective bronze-bordered square as specifically directed by Chamber/Trust procedures. Each affected star shall be promptly crated and stored, at a secured off-site location;
- Following completion of Project construction, reinstallation of each affected star at its original documented location shall occur within a newly poured, color-matched terrazzo sidewalk [by a qualified restoration contractor] with work completed to the satisfaction of the Chamber/Trust, the Office of Historic Resources, and the Department of Public Works Bureau of Engineering; and
- Excavation and construction activities in the vicinity of the Hollywood Walk of Fame and work conducted by the restoration contractor to remove, store, and replace affected areas of the Hollywood Walk of Fame, shall be monitored by a qualified historic preservation consultant meeting the Secretary of the Interior's Professional Qualification Standards for Architectural History and documented in a monitoring report that shall be provided to the City of Los Angeles, Office of Historic Resources, and the Chamber/Trust.

- **CUL-MM-2:** Excavation and shoring have the potential to damage buildings in close proximity to the Project Site; therefore, the following procedures are required for shoring system design and monitoring of excavation, grading, and shoring activities are proposed:

  - Excavation and shoring plans and calculations for temporary shoring walls shall be prepared by a California Registered Civil Engineer experienced in the design and construction of shoring systems and hired under the excavation subcontractor. The shoring systems shall be selected and designed in accordance with all current code requirements, industry best practices, and the recommendations of the Project Geotechnical Engineer. Maximum allowable lateral deflections for the Project Site are to be developed by the Project Geotechnical Engineer in consideration of

adjacent structures, property, and public rights-of-way. These deflection limits shall be prepared in consideration of protecting adjacent historic resources. The shoring engineer shall produce a shoring design, incorporating tie-backs, soldier piles, walers, etc., that is of sufficient capacity and stiffness to meet or exceed the Project strength and deflection requirements. Calculations shall be prepared by the shoring engineer showing the anticipated lateral deflection of the shoring system and its components and demonstrating that these deflections are within the allowable limits. Where tie-back anchors shall extend across property lines or encroach into the public rights-of-way, appropriate notification and approval procedures shall be followed. The final excavation and shoring plans shall include all appropriate details, material specifications, testing and special inspection requirements and shall be reviewed by the Project Geotechnical Engineer for conformance with the design intent and submitted to LADBS for review and approval during the Grading Permit application submission. The Project Geotechnical Engineer shall provide on-site observation during the excavation and shoring work.

- The general contractor shall hire a California Registered Professional Engineer or California Professional Land Surveyor to prepare an Adjacent Structures Construction Monitoring Plan, subject to review and approval by LADBS, prior to initiation of any excavation, grading, or shoring activities to ensure the protection of adjacent historic resources from damage due to settlement during construction and excavation. The Adjacent Structures Construction Monitoring Plan shall be carried out by a California Professional Land Surveyor and establish survey monuments and document and record through any necessary means, including video, photography, survey, etc. the initial positions of adjacent structures, sidewalks, buildings, utilities, facades, cracks, etc. to form a baseline for determining settlement or deformation. Upon installation of soldier piles, survey monuments shall be affixed to the tops of representative piles so that deflection can be measured. The shored excavation and adjacent structures, sidewalks, buildings, utilities, facades, cracks, etc. shall be visually inspected each day. Survey monuments shall be measured at critical stages of dewatering, excavation, shoring, and construction but shall not occur less frequently than once every 30 days. Reports shall be prepared by the California Professional Land Surveyor documenting the movement monitoring results.
- Appropriate parties shall be notified immediately and corrective steps shall be identified and implemented if movement exceeds predetermined thresholds, calculated amounts, or if new cracks or distress are observed in adjacent structures, sidewalks, buildings, utilities, façades, etc. In the event that settlement due to excavation or construction activity causes damage requiring touch-ups or repairs to the finishes of adjacent historic buildings, (specifically the Capitol Records Building, the Gogerty Building, Pantages Theatre, Avalon Hollywood, and 6316-24 Yucca Street/Art Deco Building storefront), that work shall be performed in consultation with a qualified

preservation consultant and in accordance with the California Historical Building Code and the Secretary of the Interiors' Standards, as appropriate.

Foundation systems are to be designed in accordance with all applicable loading requirements, including seismic, wind, settlement, and hydrostatic loads, as determined by the California Building Code and in accordance with the recommendations provided by the Project Geotechnical Engineer. Foundation systems are anticipated to consist of a cast-in-place concrete mat foundations supported by cast-in-place concrete drilled shaft or auger cast piles. Driven piles shall not be used.

(3) Level of Significance After Mitigation

With implementation of mitigation measures, Project impacts to historical resources would be reduced to a less-than-significant level with the exception of potential temporary construction vibration and settlement effects on certain off-site historical resources (specifically the Pantages Theatre, Avalon Hollywood, and 6316-24 Yucca Street/Art Deco Building storefront). While the mitigation provided would avoid significant impacts on the Capitol Records Building and Gogerty Building and would provide similar protections to the other buildings subject to potential structural damage from vibration and settlement, Mitigation Measure CUL-MM-2, presented above, and Mitigation Measure NOI-MM-4, presented in Section IV.I, *Noise*, of this EIR, would require the consent of other property owners who may not agree to participate in the mitigation measures; therefore, it is conservatively concluded that structural vibration and settlement impacts on certain historical resources adjacent to the Project Site would remain significant and unavoidable.

Potentially significant direct and indirect impacts to the Hollywood Walk of Fame during construction would be reduced to a less than significant level through implementation of Mitigation Measure CUL-MM-1 and associated requirements for the removal, storage, reinstallation and restoration of portions of the Hollywood Walk of Fame.

Threshold (b): Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

(1) Impact Analysis

Review of previous investigations in the vicinity of the Project Site, as well as review of the prehistoric context for the area, provides an understanding of the potential for encountering prehistoric and historic archaeological resources within the Project Site during Project construction. When completing analysis of subsurface archaeological site sensitivity, important factors to consider include elevation, soil conditions, proximity to water, proximity to raw materials, and ethnographic and historic information. It is also necessary to evaluate the historic

land use and past development and disturbances on the Project Site in determining the possibility for the preservation of subsurface prehistoric archaeological materials.

There is potential for the Project Site to contain subsurface archaeological resources. The current development within the Project Site that would be subject to excavation primarily consists of surface parking lots. Archaeological deposits are frequently located beneath parking lots where construction activities would not have likely destroyed any potential subsurface remnant associated with the previous residential dwellings, if any such remnants do exist. Additionally, the geotechnical report prepared for the Project indicates that the Project Site is underlain by 1 to 8 feet of historic fill, which likely represents a historic disturbance layer.[45] Such layers are unlikely to represent imported fill but instead may be the result of historic development and demolition, which could contain historic period archaeological resources. Furthermore, the area is located less than two miles from the natural course of the Los Angeles River near the intersection that joins the Cahuenga Pass with the Los Angeles basin and may have been a focus of prehistoric human habitation. Holocene age Younger Alluvium in the subsurface of the Project Site, beneath artificial fill, indicates that it may contain buried archaeological deposits. Though unlikely, as no previously known burial sites or cemeteries have been identified, the Project Site has the potential for the preservation of buried resources and therefore could also contain human remains buried prehistorically or outside of a formal cemetery. The excavation associated with Project buildings would extend to a maximum depth of approximately 64 feet below the existing ground surface and into both the historic fill layer, as well as the native soils beneath which have the potential to contain prehistoric and/or historic archaeological resources, which could qualify as historical resources or unique archaeological resources under CEQA.

As a result of the archival research and archaeological resources survey conducted for the Project, no archaeological resources have been identified within or immediately adjacent to the Project Site. However, this does not preclude the possibility that subsurface archaeological deposits underlie the Project Site. Such resources could qualify as historical resources under CEQA, and impacts to any such resources would constitute a significant impact on the environment.

The historic map and aerial photo review indicates that the Project vicinity, including the Project Site, is located in an area that has seen various phases of development—initially residential and subsequently commercial—since the early 1900s. Evidence of this past development in the form of subsurface historic period archaeological deposits, including privies, foundation remnants, and trash scatters, could be present. To the south of the Project Site is P-19-003545, a

[45] Feffer Geological Consulting, Geotechnical Investigation for EIR, Hollywood Center Development, 2019. Provided in Appendix G-3, of this Draft EIR.

historic period archeological site that contains a foundation, structure pads, privies, a dump, and a trash scatter was previously recorded. A previous geotechnical study that was conducted for the Project Site, which indicated a layer of artificial fill beneath the Project Site containing bricks, also supports this assessment.[46]

Therefore, the Project's or the Project with the East Site Hotel Option's grading and excavation may substantially disturb, damage, or degrade previously unknown archaeological resources. As a result, the Project or the Project with the East Site Hotel Option construction has the potential to cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5, which may result in a potentially significant impact to archaeological resources.

(2) Mitigation Measures

The following mitigation measures would reduce potentially significant impacts on archaeological resources:

- **CUL-MM-3:** Prior to issuance of a grading permit and prior to the start of any ground-disturbing activity, the Applicant shall retain a qualified archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during construction excavations, such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project, including peripheral activities, such as sidewalk replacement, utilities work, and landscaping, which may occur adjacent to the Project Site. The frequency of monitoring shall be based on the rate of excavation and grading activities, the materials being excavated (younger sediments vs. older sediments), the depth of excavation, and, if found, the abundance and type of archaeological resources encountered. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined adequate by the Qualified Archaeologist. Prior to commencement of excavation activities, Archaeological Sensitivity Training shall be given for construction personnel. The training session shall be carried out by the Qualified Archaeologist and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.

- **CUL-MM-4:** In the event that historic (e.g., bottles, foundations, refuse dumps/privies, railroads, etc.) or prehistoric (e.g., hearths, burials, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A 50-foot buffer within which construction activities shall not be allowed to continue shall be established by

46 Langan Engineering and Environmental Services (Langan). Preliminary Geotechnical Engineering Study, Millennium Hollywood Development, Hollywood California. 2012.

the Qualified Archaeologist around the find. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by Project construction activities shall be evaluated by the Qualified Archaeologist. If a resource is determined by the Qualified Archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the Applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If, in coordination with the City, it is determined that preservation in place is not feasible, appropriate treatment of the resource shall be developed by the Qualified Archaeologist in coordination with the City and may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school, Tribe, or historical society in the area for educational purposes.

- **CUL-MM-5:** Prior to the release of the grading bond,[47] the Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register and CEQA. The report and the Site Forms shall be submitted by the Applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the development and required mitigation measures.

(3) Level of Significance After Mitigation

With implementation of mitigation measures, potentially significant impacts to archaeological resources would be reduced to a less-than-significant level.

[47] A grading bond ensures the permit applicant is in compliance with the LAMC's rules and regulations.

Threshold (c): Would the Project disturb any human remains including those interred outside of formal cemeteries?

(1) Impact Analysis

Although no human remains were identified during the pedestrian survey of the Project Site and no known human remains have been recorded within the Project Site or a 0.5-mile radius, the overall sensitivity of the Project Site with respect to archaeological resources is moderate to high in light of the level of excavation proposed for the Project that would encounter previously unexcavated areas. Archaeological deposits are frequently located in relatively close proximity to water sources, and these deposits could contain human remains. Therefore, the overall sensitivity with respect to human remains appears to be moderate.

The Project Site has been previously disturbed by the original construction of the existing buildings. However, Project grading and excavation would extend into previously undisturbed subsurface areas or other locations where there is some possibility, although unlikely, that they may encounter buried human remains. As a result, construction could disturb human remains, including those interred outside of dedicated cemeteries. Such an event is a potentially significant impact under CEQA.

California PRC Section 5097.98, as amended by Assembly Bill 2641, protects cultural resources on public lands and provides procedures in the event human remains of Native American origin are discovered during construction activities. PRC Section 5097.98 requires notification of the County Coroner in the event of the unanticipated discovery of human remains and a prescribed protocol for their disposition in accordance with applicable regulations, notification of the NAHC and subsequent tribal coordination if remains are determined to be of Native American descent.

Compliance with applicable regulatory requirements would ensure that the Project and the Project with the East Site Hotel Option's impacts on human remains would be less than significant.

(2) Mitigation Measures

Impacts regarding human remains were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding human remains were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

Construction activities, including excavation depths, building footprint, and construction methods, would be essentially the same under the Project and the Project with the East Site Hotel Option. Accordingly, cumulative construction impacts would be essentially the same under the Project or the Project with the East Site Hotel Option. Thus, the conclusions regarding cumulative construction impacts presented in the analyses below are the same and apply to the Project or the Project with the East Site Hotel Option.

Also, as discussed in the Project-level impact analysis above, the Project's impacts regarding cultural resources for the Project or the Project with the East Site Hotel Option would be essentially the same. Therefore, the Project's contribution to cumulative operational cultural resources impacts for the Project or the Project with the East Site Hotel Option would be essentially the same. Thus, the conclusions regarding the cumulative impact analysis, impact significance and mitigation measures presented below are the same and apply to the Project or the Project with the East Site Hotel Option.

(1) Impact Analysis

(a) Historical Resources

A significant cumulative impact associated with the Project and related projects would occur if the impact would render a historical resource or district as no longer eligible for listing, and the Project's contribution to the impact would be cumulatively considerable. Related projects that have the potential to result in combined or cumulative impacts in association with the impacts of the Project are identified in Chapter III, *Environmental Setting*, which includes Table III-1, *Related Projects List*, and Figure III-1, *Related Projects Map*, which shows the locations of each of the related projects listed in Table III-1. In assessing cumulative impacts on historical resources, the focus is on related projects that are located in the immediate vicinity of the Project that have the potential to contribute to changes in the setting of identified historical resources on the Project Site and in the vicinity, including historic districts. These related projects include:

- Related Project No. 1, the Argyle House, a new 17-story residential/mixed-use building located at 6230 W. Yucca Street on the southwest corner of the Yucca Street and Argyle Avenue, adjacent to (northeast) of the East Site and Capitol Records Complex;
- Related Project No. 2, a proposed 14-story hotel located just south and adjacent to the East Site at 1718 North Vine Street;
- Related Project No. 3, a new 14-story hotel located at 1800 North Argyle on the northeast corner of Yucca Street and Argyle Avenue; and

- Related Project No. 4, a proposed 20-story mixed-use residential, hotel, and retail project located at 6220 Yucca Street, northeast of the Project Site on the southeast corner of Yucca Street and Argyle Avenue.

As discussed above, the Project would not have direct impacts on the Capitol Records Complex, and while the Project would have a temporary adverse effect on the Hollywood Walk of Fame, through compliance with the Walk of Fame Guidelines and implementation of Mitigation Measure CUL-MM-1, the Hollywood Walk of Fame would be preserved and restored. Furthermore, removal of five existing curb cuts would enhance the setting and emphasize the Hollywood Walk of Fame as a continuous element oriented towards pedestrians without potential vehicular/pedestrian conflicts that currently exist at these junctures. In terms of indirect impacts, while the Project would alter the larger setting of the area due to its scale, it would not cause a substantial material change to the surrounding setting of any identified historical resources or districts in the vicinity of the Project Site such that their historical significance would be materially impaired.

As previously indicated, historic setting characteristics important to the Hollywood Boulevard Commercial and Entertainment District and other historical resources in the Project vicinity include the configuration of streets and sidewalks fronting the buildings, the pattern and spatial relationships of tightly spaced buildings defining a linear commercial corridor, and the public circulation space delineated by a uniform building street wall. While the Project would add considerable height and mass adjacent to the north of the Hollywood Boulevard Commercial and Entertainment District and in proximity to other nearby historical resources, the Project would not adversely affect the historic setting characteristics of the Hollywood Boulevard Commercial and Entertainment District or other nearby historical resources such that their listing or eligibility for listing as historical resources at the national, state, or local level would be threatened. Considering these Project effects in association with related projects in the area, the combined effects would similarly not materially impair historical resources or interrupt important views of them, and the historical resources would remain visually prominent and their spatial relationships and their relationships to the streets that characterize their historic settings would not be adversely affected.

While Related Project No. 1 was recently constructed adjacent (northeast) to the Capitol Records Complex, substantial setbacks and other design features were incorporated into Related Project No. 1 such that important views of the Capitol Records Complex have been retained and the Capitol Records Complex remains visually prominent and continues to convey its historical significance. The Project itself includes architecturally distinct buildings that are designed to pay homage to and are compatible with the design of the Capitol Records Complex, and the locations and forms of the new buildings and setbacks included in the Project would maintain the visual prominence and important views of the Capitol Records Complex. Therefore, while there would be a combined effect on the setting of the

Capitol Records Complex from the Project and recently constructed Related Project No. 1, with considerable increases in building heights, these effects would not alter its historical significance or represent a cumulatively considerable impact.

Related Project No. 2 is a proposed 14-story hotel at 1718 North Vine Street that would be located adjacent to the East Site on the south between the Capitol Records Complex and the Hollywood Equitable Building (Map No. B.2) at 6253 Hollywood Boulevard. The Hollywood Equitable Building is adjacent to the Pantages Theatre building and is a contributor to the Hollywood Boulevard Commercial and Entertainment District. However, Related Project No. 2 would be located north of the Hollywood Boulevard Commercial and Entertainment District outside the district boundary, and south of the Capitol Records Complex, and would not directly impact any historical resources. While the added heights associated with Project and Related Project No. 2 would alter the setting of the larger area, the historic setting of the Hollywood Equitable Building (Map No. B.2) and the Pantages Theatre (Map No. B.1)—both buildings located within the Hollywood Boulevard Commercial and Entertainment District—would not be affected. Furthermore, the lower scale and spatial relationships of the Hollywood Boulevard Commercial and Entertainment District would not be altered. The larger, taller buildings that have developed in the surrounding area since the late 1950s, when the prevailing height limit of 150 feet was removed, have already altered the urban setting that is now characterized by its variety and juxtaposition of scale.

However, although somewhat speculative, there is potential for Related Project No. 2 to be under construction at the same time as the Project. If this were to occur, due to close proximity, there would be potential for Related Project 2 and the Project to result in combined construction vibration and settlement effects that could damage the Pantages Theatre. As previously indicated for the Project, as is common in similar urban development sites, vibration and settlement would be controlled through adherence to design values prescribed by the shoring engineer and geotechnical engineer with the intent to prevent damage to adjacent structures, and through monitoring of associated construction activities. Although steps would be taken during construction to help ensure design values are not exceeded, if exceedance were to occur and to result in structural damage, based on industry practice and knowledge of construction activities in similar settings such damage would likely be surficial and repairable. Nonetheless, the potential for damage to this historical resource due to construction-related vibration and settlement is considered a significant impact of the Project, and mitigation measures are proposed for shoring design and for monitoring of shoring activities, grading, and excavation to address potential for structural damage due to settlement. Similarly, Related Project No. 2 includes proposed mitigation related to vibration effects on the Pantages Theatre. Mitigation Measure NOI-MM-4, includes pre-construction building inspections and vibration monitoring, and Mitigation Measure CUL-MM-2, includes requirements for shoring design and for monitoring of shoring activities and grading and excavation to address potential for

structural damage due to settlement. However, as further described below under, *Level of Significance After Mitigation*, because mitigation requires the consent of other property owners who may not agree to participate in implementation on their property, it is conservatively concluded that cumulative structural vibration and settlement effects on the Pantages Theatre would be cumulatively considerable and constitute significant cumulative impacts that would remain significant and unavoidable after implementation of mitigation measures.

Related Project No. 3 is a 14-story hotel located at 1800 North Argyle on the northeast corner of Yucca Street and Argyle Avenue, northeast across the intersection from the Capitol Records Complex. The Project and Related Project No. 3 would not adversely impact either the Capitol Records Complex or other historical resources in the vicinity that are located across Yucca Street to the south, including the former site of Little Country Church of Hollywood, a state-designated historic resource, as well as a locally-designated Historic-Cultural Monument (Map No. 3) at 1750 Argyle Avenue, [48] St. Stephen's Episcopal Church (Map No. 4) at 6125 San Carlos Avenue, or the Vista del Mar Avenue/Carlos Avenue District. Therefore, the Project, in combination with Related Project No. 3, would not alter the historic significance of historical resources or represent a cumulatively considerable impact.

Related Project No. 4 would construct a proposed 32-story building consisting of a mixed-use residential, hotel, and retail project at 6220 Yucca Street, east of the Project Site on the southeast corner of Yucca Street and Argyle Avenue. Regarding the potential for cumulative impacts from the Project and Related Project Nos. 1 and 4 on the Pantages Theatre (Map No. B.1) and the Hollywood Blvd. Historic District, the primary façades of the Pantages Theatre and most of the buildings in the Hollywood Boulevard Commercial and Entertainment District are oriented toward Hollywood Boulevard, while the Hollywood Equitable Building is situated on the northeast corner of the intersection facing Vine Street. The Pantages Theatre—which fronts onto Hollywood Boulevard—would retain its visual prominence upon the street. The Pantages Theatre, located at the northwest corner of Hollywood Boulevard and Argyle Avenue directly south of the East Site, faces southward, away from the Project Site. As discussed above, the only view of the Pantages Theatre that would be obscured by the Project and Related Project Nos. 1 and 4 is a far-distant view of the building's rear elevation, where there would not be a combined effect with the related projects. The rear elevation of the Pantages Theatre—which is the building's least significant elevation as it is not articulated architecturally—would still be viewable from the alley.

[48] The Little Country Church of Hollywood was determined eligible for the National Register by consensus in 1997; it is, therefore, automatically listed in the California Register. It is also designated as a Historic-Cultural Monument (#567) by the City of Los Angeles. However, the building was destroyed by fire in 2008. Nevertheless, the site maintains its designation as Historic-Cultural Monument #567, and is treated as a historical resource herein for the purposes of CEQA.

While the added heights associated with the Project and the related projects would alter the larger setting of the area, the historic setting of the Hollywood Boulevard Commercial and Entertainment District and the other historical resources is characterized by their low massing in comparison to larger, taller buildings in the surrounding area. Hollywood has been characterized by such juxtapositions since the late 1950s when the prevailing height limit of 150 feet was removed and larger scale development ensued, altering the former low-scale setting of the area. While the introduction of additional tall buildings would continue this pattern of development, the significance of historical resources in the area would not be materially impaired.

Impacts due to potential construction, vibration and temporary alterations to the Hollywood Walk of Fame would be reduced to less than significant through Mitigation Measure CUL-MM-1. Potential impacts due to structural vibration and settlement on the Capitol Records Building and Gogerty Building would be reduced to less than significant with implementation of Mitigation Measures CUL-MM-2, and NOI-MM-4. The mitigation provided would avoid significant impacts on the Capitol Records Building and Gogerty Building and would provide similar protections to the other proximate historical buildings subject to potential structural damage from vibration, as follows: the Pantages Theatre, the Avalon Hollywood, and the building located at 6316-24 Yucca Street/Art Deco Storefront. However, because Mitigation Measure CUL-MM-2 and Mitigation Measure NOI-MM-4 require the consent of other property owners, who may not agree to participate in its implementation, it is conservatively concluded that structural vibration and settlement impacts on the Pantages Theatre would remain significant and unavoidable.

Therefore, the Project's or the Project with the East Site Hotel Option's contribution to cumulative impacts in association with Related Project No. 2 due to potential for construction vibration and settlement would be cumulatively considerable and would represent a significant cumulative impact. However, cumulative impacts related to other resources would not be significant.

(b) Archaeological Resources and Human Remains

Impacts related to archaeological resources qualifying as historical resources or unique archaeological resources under CEQA are in most cases site-specific because they occur on a project level as a result of a project's ground disturbance activities during construction and, as such, are assessed on a project-by-project basis. Many of the related projects within the study area would require excavation that could potentially expose or damage archaeological resources potentially qualifying as historical resources. However, the related projects are also located in highly developed urban areas with sites that have been previously disturbed that are on separate sites not adjacent to the Project Site. The potential of such related projects to encounter and cause, in conjunction with the Project, a significant cumulative impact on archaeological resources is limited. Further, in association with CEQA review, and depending on the depth of excavation and sensitivity of

respective sites, mitigation measures, including avoidance and preservation in place or other treatment, would be required for related projects that have the potential to cause significant impacts to undiscovered (subsurface) archaeological resources qualifying as historical resources under CEQA. As with the Project, such measures, if implemented, would reduce project-level significant impacts to a less-than-significant level.

Additionally, the potential for related projects to cause a significant impact with respect to human remains is low, but if human remains are encountered, compliance with State law would ensure that any such impacts would be reduced to a less-than-significant level. As a result of State law compliance, impacts with respect to human remains for the Project would also be less than significant.

The Project is required to implement Mitigation Measures CUL-MM-3 through CUL-MM-5 for archaeological resources and comply with applicable regulatory requirements for discovery of human remains, thereby ensuring proper identification, treatment, and preservation of any resources, and reducing significant Project impacts on archaeological resources and human remains to less-than-significant levels. Similarly, the related projects would be required to comply with applicable regulations and standard City mitigation measures regarding discovery of archaeological resources and human remains. **Therefore, the Project's and the Project with the East Site Hotel Option's contribution to cumulative impacts related to archaeological resources and human remains would not be cumulatively considerable. Cumulative impacts on archaeological resources and human remains would be less than significant.**

(2) Mitigation Measures

Refer to Mitigation Measures CUL-MM-1 to CUL-MM-5. No additional mitigation measures are applicable.

(3) Level of Significance After Mitigation

With implementation of mitigation measures, cumulative level impacts to historical resources would be reduced to a less-than-significant level with the exception of potential temporary construction vibration and settlement effects on certain off-site historical buildings. While the mitigation provided would avoid significant impacts on the Capitol Records Building and Gogerty Building and would provide similar protections to the other buildings subject to potential structural damage from vibration and settlement, such as for the Pantages Theatre, Mitigation Measure CUL-MM-2 and NOI-MM-4 would require the consent of other property owners who may not agree to participate in the mitigation measures; therefore, it is conservatively concluded that Project's or the Project with the East Site Hotel Option's cumulative structural vibration and settlement impacts on the Pantages Theatre would remain significant and unavoidable. Through implementation of Mitigation Measure CUL-MM-1 and related project compliance with the Hollywood Walk of Fame Guidelines, impacts on this resource would not be cumulatively considerable and cumulative impacts would be less than significant.

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IV. Environmental Impact Analysis

D. Geology and Soils

1. Introduction

This section discusses the geologic conditions at the Project Site and vicinity as they relate to potential geologic hazards and paleontological resources. The potential Project impacts and mitigations are largely based on information provided in site-specific technical reports prepared and presented in the documentation contained in Appendix G, Geotechnical Reports and Paleontological Resources Documentation, which are listed below:

- Group Delta Consultants, Inc. Fault Activity Investigation, East and West Millennium Sites 1733-1741 Argyle Avenue; 6236 and 6334 West Yucca Street; 1720-1730, 1740, 1745-1760, and 1762-1770 N. Ivar Avenue, Hollywood Area, City of Los Angeles, California, March 6, 2015 (2015 Fault Study), provided in Appendix G-1 of this Draft EIR
- Group Delta Consultants, Inc., Surface Fault Rupture Hazard Evaluation Report, Hollywood Tract, Block 21, Lots 1 and FR2 [APN 5546004029], 6334 W Yucca Street And 1770 N Ivar Avenue and Recommendations For 50-Foot Setback Removal at Hollywood Tract, Block 21, Lot 3 [APN 5546004008] And Central Hollywood Tract No. 2, Lot FR6 [APN 5546030034], 1760 And 1764 N Ivar Avenue And 1720, 1722, And 1734 N Vine Street, Los Angeles, California, July 19, 2019 (2019 Fault Study), provided in Appendix G-2 of this Draft EIR
- Feffer Geological Consulting, Geotechnical Investigation for EIR, Hollywood Center Development, 1733-1741 Argyle Avenue; 6236 and 6334 West Yucca Street; 1720-1730, 1740, 1745-1760, and 1762-1770 N. Vine Street; 1746, 1748-1754, 1760, and 1764 N. Ivar Avenue, Hollywood Area City of Los Angeles, California, September 23, 2019 (Geotechnical Investigation), provided in Appendix G-3 of this Draft EIR
- Environmental Science Associates (ESA), Paleontological Resources Assessment Report, January 2019, provided in Appendix G-4 of this Draft EIR

It is important to note that in addition to the site-specific field work conducted for this Project, the above-cited investigations reviewed and considered available information provided in previous reports and from published sources. For example, considerable seismic information is available from the California Geological Survey (CGS) and the U.S. Geological Survey (USGS), and the site-specific investigations considered, used, and cited those sources, as appropriate. In addition, numerous

previous investigations have been conducted for the Project Site and nearby sites. The above-cited investigations reviewed, incorporated, and updated the information, as appropriate. The tables below, **Table IV.D-1**, *Prior On-Site Geotechnical Investigations Performed*, and **Table IV.D-2**, *Local Geotechnical Investigations Performed*, cite relevant previous site-specific and nearby investigations.

TABLE IV.D-1
PRIOR ON-SITE GEOTECHNICAL INVESTIGATIONS PERFORMED

Consultant	Report Date and Type	Fault Related Investigation/Conclusions
Langan Engineering & Enviro. Services	5/10/2012 Geotechnical	• Four geotechnical borings to depths ranging from 61.5 to 101.5 feet • Feasible Project with conditions that could be mitigated
Group Delta Consultants (See Appendix G)	3/6/2015 Fault Activity Investigation	• 35 continuous core borings, 78 Cone Penetrometer Tests (CPTs), maximum explored depth of 60 feet, two fault study trenches on the East Site • No Holocene-active faults – Project approved for redevelopment
Earth Consultants International	3/9/2015 & 6/3/2015 Fault Study Review	• Third-party opinion of 2015 Group Delta investigation • Agreed no Holocene-active faults – Project approved for redevelopment
Rockwell Consulting	12/13/2018 Fault Study Review	• Paleoseismic and soil specialist interpretation of the Holocene seismic history at the Project Site • No Holocene-active faults – Project approved for redevelopment
Earth Consultants International	7/18/2019 Fault Study	• Third-party review of 2019 Group Delta investigation • Agreed no Holocene-active faults – Project approved for redevelopment
Group Delta Consultants (See Appendix G)	7/19/2019 Surface Fault Rupture Hazard Evaluation Report	• 8 continuous core borings to maximum depth of 55 feet, 18 cone penetrometer test borings to maximum depth of 60 feet, three trenches to maximum depth of 15 feet, soil horizon dating, concluded no fault activity within at least the last 120,000 years • No Holocene-active faults • Recommended removal of 50-foot building setback zone for Project Site
Feffer Geological Consulting (See Appendix G)	9/23/2019 Geotechnical Investigation	• Researched previous investigations, 4 soil borings to maximum depth of 135.5 feet, installation of one groundwater monitoring well, geotechnical testing of soil samples, provided preliminary geotechnical recommendations for project design, concluded project feasible with mitigatable conditions

SOURCE: ESA, 2019

TABLE IV.D-2
LOCAL GEOTECHNICAL INVESTIGATIONS PERFORMED

Consultant	Location	Report Date and Type	Fault Related Investigations/Conclusions
Group Delta Consultants	1800 Argyle Avenue	6/30/2014 Geotechnical	• See 2015 Fault Study • Feasible project with mitigatable conditions
Group Delta Consultants	1756,1760 Argyle Avenue	9/7/2014 Fault Study	• 13 CPTs, 5 continuous core borings, fault trenches, bucket auger borings • No Holocene-active faults – project approved for redevelopment
Group Delta Consultants	6220 West Yucca Street	10/7/2015 Geotechnical	• See 2015 Fault Study • Feasible project with mitigatable conditions
Group Delta Consultants	1800 Argyle Avenue	11/10/2015 Fault Study	• 20 CPTs, 2 Bucket auger borings, 9 Continuous core borings, fault trenches • No Holocene-active faults – project approved for redevelopment
Group Delta Consultants	1718 Vine Street	7/28/2016 Fault Study	• 7 continuous core borings, 14 CPTs, maximum explored depth of 80 feet • No Holocene-active faults; feasible project with mitigatable conditions; project approved for redevelopment
Rockwell Consulting	6305 Yucca Street	7/9/2018 Fault Study	• Paleoseismic and soil specialist interpretation of the Holocene seismic history at the site • No Holocene-active faults – project approved for redevelopment
Group Delta Consultants	6305 Yucca Street	8/30/2018 Fault Study	• Core borings and fault trenches • No Holocene-active faults – project approved for redevelopment

SOURCE: ESA, 2019

2. Environmental Setting

a) Regulatory Framework

(1) State

(a) Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act (Public Resources Code [PRC] Section 2621) was enacted by the State of California in 1972 to address the hazards related to surface faulting and the impacts to structures, particularly those

used for human occupancy.[1] The Alquist-Priolo Earthquake Fault Zoning Act was a direct result of the 1971 San Fernando Earthquake, which was associated with extensive surface fault ruptures that damaged homes, commercial buildings, and other structures. The primary purpose of the Alquist-Priolo Earthquake Fault Zoning Act is to regulate development near active faults so as to mitigate the hazard of surface fault rupture.

The Alquist-Priolo Earthquake Fault Zoning Act requires the State Geologist to establish regulatory "earthquake fault zones" around the surface traces of Holocene-active faults and to issue appropriate maps to assist cities and counties in planning, zoning, and building regulation functions. The State Geologist distributes maps to all affected cities and counties to assist them in regulating new construction and renovations. These maps are required to define potential surface rupture or fault creep. The State Geologist is charged with continually reviewing new geologic and seismic data, revising existing zones, and delineating additional earthquake fault zones when warranted by new information. Local agencies must enforce the Alquist-Priolo Earthquake Fault Zoning Act in the development permit process, where applicable, and may be more restrictive than State law requirements. Projects within an earthquake fault zone can be permitted but only after cities and counties have required a geologic investigation, prepared by licensed geologists, to demonstrate that buildings will not be constructed across active faults. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back a minimum distance established by the local city or county.

The Alquist-Priolo Earthquake Fault Zoning Act and its regulations are presented in CGS' Special Publication (SP) 42, Fault-Rupture Hazard Zones in California.[2] In addition to providing a source and background information for Earthquake Fault Zone maps, the revised 2018 version also provides state-of-the-practice guidelines for affected permitting agencies and their reviewers, geoscience consulting practitioners, property owners, and developers. Such guidelines were previously provided in CGS Note 41, "General Guidelines for Reviewing Geologic Reports" and Note 49, "Guidelines for Evaluating the Hazard of Surface Fault Rupture," which traditionally have been included as appendices to Special Publication 42. The information presented in those notes has been significantly updated, expanded, and incorporated into the 2018 version.

(b) Seismic Hazards Mapping Act

In order to address the effects of strong ground shaking, liquefaction, landslides, and other ground failures due to seismic events, the State of California passed the Seismic Hazards Mapping Act of 1990 (PRC Section 2690-2699), which requires

1 The Act was originally entitled the Alquist-Priolo Geologic Hazards Zone Act.

2 CGS, Earthquake Fault Zones, A Guide For Government Agencies, Property Owners / Developers, and Geoscience Practitioners for Assessing Fault Rupture Hazards in California, Special Publication 42, 2018.

the State Geologist to delineate "seismic hazard zones." Cities and counties must regulate certain development projects within these zones until the geologic and soil conditions of their project sites have been investigated and appropriate mitigation measures, if any, have been incorporated into development plans. The State Mining and Geology Board provides additional regulations and policies to assist municipalities in preparing the Safety Element of their General Plan and encourage land use management policies and regulations to reduce and mitigate those hazards to protect public health and safety. Under PRC Section 2697, cities and counties must require, prior to the approval of a project located in a seismic hazard zone, submission of a Geotechnical Report defining and delineating any seismic hazard. Each city or county must submit one copy of each Geotechnical Report, including mitigation measures, to the State Geologist within 30 days of its approval. Under PRC Section 2698, cities and counties may establish policies and criteria which are stricter than those established by the Mining and Geology Board.

State publications supporting the requirements of the Seismic Hazards Mapping Act include CGS SP 117A, Guidelines for Evaluating and Mitigating Seismic Hazards in California, (SP 117A)[3] discussed above, and CGS SP 118, Recommended Criteria for Delineating Seismic Hazard Zones in California. (SP 118).[4] SP 117A provides guidelines to assist in the evaluation and mitigation of earthquake-related hazards for projects within designated zones requiring investigations and to promote uniform and effective Statewide implementation of the evaluation and mitigation elements of the Seismic Hazards Mapping Act.[5] SP 118 provides recommendations to assist CGS in carrying out the requirements of the Seismic Hazards Mapping Act to produce the Probabilistic Seismic Hazard Maps for the State.

(c) California Building Code

The 2019 California Building Code (CBC), Title 24 of the California Code of Regulations, is a compilation of building standards, including seismic safety standards, for new buildings. California Building Code standards are based on building standards that have been adopted by State agencies without change from a national model code, building standards based on a national model code that have been changed to address particular California conditions, and building standards authorized by the California legislature but not covered by the national model code. The CBC applies to all occupancies in California, except where stricter standards have been adopted by local agencies. Specific CBC building and

3 CGS, Guidelines for Evaluating and Mitigating Seismic Hazards in California, Special Publication 117A, 2008.

4 CGS, Recommended Criteria for Delineating Seismic Hazard Zones in California, Special Publication 118, 2004.

5 CGS, Guidelines for Evaluating and Mitigating Seismic Hazards in California, Special Publication 117A, 2008.

seismic safety regulations have been incorporated by reference into the Los Angeles Municipal Code (LAMC), with local amendments.

The CBC is published on a triennial basis, and supplements and errata can be issued throughout the cycle. The 2019 edition of the CBC became effective on January 1, 2020, and incorporates by adoption the 2018 edition of the International Building Code of the International Code Council, with California amendments. The 2019 CBC incorporates the latest seismic design standards for structural loads and materials as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and provide for the latest in earthquake safety. The current CBC has been adopted by the City as the Los Angeles Building Code, with local amendments. As such, the CBC forms the basis of the Los Angeles Building Code.

(d) CEQA Guidelines, Paleontological Resources

The CEQA Guidelines (Title 14, Chapter 3 of the California Code of Regulations, Section 15000 et seq.), define the procedures, types of activities, individuals, and public agencies required to comply with CEQA. As part of CEQA's Initial Study process, and in addition to several questions focused on hazards associated with geology and soils, one of the questions for lead agencies relates to paleontological resources: "Will the proposed project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?" (CEQA Guidelines Section 15023, Appendix G, Section XIV, Part a).

The loss of any identifiable fossil that could yield information important to prehistory, or that embodies the distinctive characteristics of a type of organism, environment, period of time, or geographic region, would be a significant environmental impact. Impacts to paleontological resources primarily concern the potential destruction or unauthorized collection of nonrenewable paleontological resources and the loss of information associated with these resources. In general, where paleontologically sensitive geologic units underlie project sites, the greater the amount of ground disturbance, the higher the potential for impacts to paleontological resources. Where geologic units with no paleontological sensitivity directly underlie project sites, there is no potential for impacts on paleontological resources, unless sensitive geologic units which underlie the non-sensitive units are also affected.

State requirements for paleontological resource management are included in PRC Section 5097.5 and Section 30244. These statutes prohibit the removal of any paleontological site or feature from public lands (as used in this section, lands owned by or under the jurisdiction of, the state, any city, county, district, authority, or public corporation, or any agency thereof) without permission of the jurisdictional agency, define the removal of paleontological sites or features as a misdemeanor, and require reasonable mitigation of adverse impacts to paleontological resources from developments on public (state, county, city, or district) lands.

(2) Local

(a) Los Angeles General Plan Safety Element

The City's General Plan Safety Element, which was adopted in 1996, addresses public safety risks due to natural disasters, including seismic events and geologic conditions, and sets forth guidance for emergency response during such disasters. The Safety Element also provides maps of designated areas within Los Angeles that are considered susceptible to earthquake-induced hazards, such as fault rupture and liquefaction.

Regarding assessment of seismic hazards, PRC Section 2699 requires that a safety element take into account available seismic hazard maps prepared by the State Geologist pursuant to the Alquist-Priolo Earthquake Fault Zoning Act. The PRC also requires that the State Geologist map active faults throughout the State. The Safety Element states that those maps, which are applicable to the City, are incorporated into Exhibit A of the Safety Element. The Safety Element also states that local jurisdictions are required by the Seismic Hazards Mapping Act to require additional studies and appropriate mitigation measures for development projects in the areas identified as potential hazard areas by the State seismic hazard maps. In addition, the Safety Element states that as maps are released for Los Angeles, they will be utilized by the Los Angeles Department of Building and Safety (LADBS) to help identify areas where additional soils and geology studies are needed for evaluation of hazards and imposition of mitigation measures prior to issuance of building permits.

The 1996 Safety Element acknowledged that it was based on available official maps at the time and that exhibits in the Safety Element would be revised following receipt of reliable new information. The LADBS maintains more detailed mapping than the generalized maps in the Safety Element and provides information regarding designations for individual site parcels within the City's Zone Information and Map Access System (ZIMAS). It is also important to note that the State of California released an updated Earthquake Zones of Required Investigation Map for the Hollywood Quadrangle on November 6, 2014.[6] This map is the State of California's official earthquake fault zone map for the Hollywood area and is the most current map available to delineate the boundaries of earthquake fault zones in the Hollywood area. The State of California map is the type of information that the Safety Element contemplated using (once available) to revise and update the seismic hazard zone exhibits therein. Accordingly, the seismic hazards analysis in this Draft EIR relies primarily on the official State of California map to determine the location of the Project Site in relation to the nearest officially mapped earthquake fault zone and other seismic hazard zones.

6 CGS, Earthquake Zones of Required Investigation, Hollywood Quadrangle, November 6, 2014.

(b) Los Angeles Municipal Code

Chapter IX of the LAMC contains the City's Building Code, which incorporates by reference the CBC, with City amendments for additional requirements. The LADBS is responsible for implementing the provisions of the LAMC. To that end, LADBS issues building and grading permits for construction projects. Building permits are required for any building or structure that is erected, constructed, enlarged, altered, repaired, moved, improved, removed, converted, or demolished. The function of the City's Building Code is to protect life safety and compliance with the LAMC. The sections of LAMC Chapter IX address numerous topics, including earthwork and grading activities, import and export of soils, erosion and drainage control, and general construction requirements that address flood and mudflow protection, slides and unstable soils. Additionally, LAMC Section 91.1803 includes specific requirements addressing seismic design, grading, foundation design, geologic investigations and reports, soil and rock testing, and groundwater. Specifically, LAMC Section 91.7006 requires that a Final Geotechnical Report with final design recommendations prepared by a California-registered geotechnical engineer and submitted to the LADBS for review prior to issuance of a grading permit. Final foundation design recommendations must be developed during final Project design, and other deep foundation systems that may be suitable would be addressed in the Final Geotechnical Report.

(c) City of Los Angeles General Plan Conservation Element

The Conservation Element of the City of Los Angeles General Plan recognizes paleontological resources in Section 3, Archaeological and Paleontological [Resources], wherein it identifies the protection of paleontological resources as an objective. The Conservation Element identifies site protection as important, stating, "Pursuant to CEQA, if a land development project is within a potentially significant paleontological area, the developer is required to contact a bona fide paleontologist to arrange for assessment of the potential impact and mitigation of potential disruption of or damage to the site. If significant paleontological resources are uncovered during project execution, authorities are to be notified and the designated paleontologist may order excavations stopped, within reasonable time limits, to enable assessment, removal or protection of the resources."[7]

[7] City of Los Angeles. Conservation Element of the City of Los Angeles General Plan, City Plan Case No. 2001-0413-GPA, Council File No. 01-1094, 2001, p. II-5.

b) Existing Conditions

This section summarizes the existing geologic conditions outlined in the Project Site Geotechnical Investigation[8] and the 2015 and 2019 Fault Studies[9,10] included in Appendix G of this Draft EIR. The information provided below is from those three investigations unless otherwise cited. As noted in the introduction to this section, the above-cited investigations reviewed and incorporated information from other sources and previous investigations, as appropriate, and citations for those other sources are provided in the above-cited reports.

The Geotechnical Investigation conducted on the Project Site included reviewing previous investigation results, drilling four hollow-stem auger borings to a maximum depth of 135.5 feet below the existing grade, converting one of the borings into a groundwater monitoring well, lithlogically logging the soil[11], and conducting geotechnical laboratory testing to further evaluate and correlate the physical properties and engineering characteristics of the soils encountered. The laboratory tests included in-place moisture and density, hydroresponse-swell/collapse, maximum dry density and shear strength testing[12], which were used to describe subsurface conditions and assess the potential for settlement, expansion, and slope stability. The Geotechnical Investigation documented and evaluated the findings to discuss Project feasibility and provide preliminary geotechnical recommendations to inform the Project design.

The 2015 and 2019 Fault Studies included reviewing previous site exploration data, site vicinity fault investigation data, drilling 48 core borings, performing 117 cone penetration tests, and excavating and logging four trenches, to evaluate the stratigraphic horizons and potential fault traces. In particular, the 2019 Fault Study evaluated soil profile horizons to age-date the observed specific soil horizons in order to evaluate whether Holocene-age fault movement has occurred on the Project Site.

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8 Feffer Geological Consulting, Geotechnical Investigation for EIR, Hollywood Center Development, 1733-1741 Argyle Avenue; 6236 and 6334 West Yucca Street; 1720-1730, 1740, 1745-1760, and 1762-1770 N. Vine Street; 1746, 1748-1754, 1760, and 1764 N. Ivar Avenue, Hollywood Area City of Los Angeles, California, September 23, 2019. See Appendix G-3 of this Draft EIR.

9 Group Delta Consultants, Fault Activity Investigation, East and West Millennium Sites 1733-1741 Argyle Avenue; 6236 and 6334 West Yucca Street; 1720-1730, 1740, 1745-1760, and 1762-1770 N. Ivar Avenue, Hollywood Area, City of Los Angeles, California, March 6, 2015. See Appendix G-1 of this Draft EIR.

10 Group Delta Consultants, Surface Fault Rupture Hazard Evaluation Report, Hollywood Tract, Block 21, Lots 1 and FR2 [APN 5546004029], 6334 W Yucca Street And 1770 N Ivar Avenue and Recommendations For 50-Foot Setback Removal at Hollywood Tract, Block 21, Lot 3 [APN 5546004008] And Central Hollywood Tract No. 2, Lot FR6 [APN 5546030034], 1760 And 1764 N Ivar Avenue And 1720, 1722, And 1734 N Vine Street, Los Angeles, California, July 19, 2019. See Appendix G-2 of this Draft EIR.

11 The lithology of a rock unit is a description of its physical characteristics, such as color, texture, grain size, and composition.

12 The density and strength tests measure the weight loading ability of a soil unit.

(1) Regional Geologic Setting

Regionally, the Project Site is located at the boundary of the Transverse and Peninsular Ranges Geomorphic Provinces within the Los Angeles Basin area of southern California. The boundary of the geomorphic provinces is defined structurally by a complex zone of faulting that includes the Santa Monica-Hollywood-Raymond Fault System, identified on **Figure IV.D-1,** *Regional Geologic Map*. The Santa Monica Mountains have been uplifted to the north relative to the Los Angeles Basin to the south along this fault zone. Cyclic Quaternary[13] sea level rise and fall has resulted in deeply eroded canyons and subsequent fill, with alluvial fan deposition at the base of the mountains. Holocene[14] alluvial deposition is concentrated within the canyons and southward extending drainages.

The Project Site is located on an alluvial fan near the base of a south-extending projection of the Hollywood Hills. At the base of the Santa Monica Mountains, canyons cut through Tertiary sedimentary rock of the Topanga Formation (note the various Tt units on Figure IV.D-1) and open southward forming alluvial fans (Qae unit on Figure IV.D-1). As discussed in the 2019 Fault Study, previous investigations have mapped a bedrock fault cutting north of the Project Site, with some placing the fault trace about 1,000 feet north of the Project Site and others placing traces closer to the Project Site. The purpose of the 2015 and 2019 Fault Studies was to evaluate the Project Site for Holocene-age faulting, as discussed below.

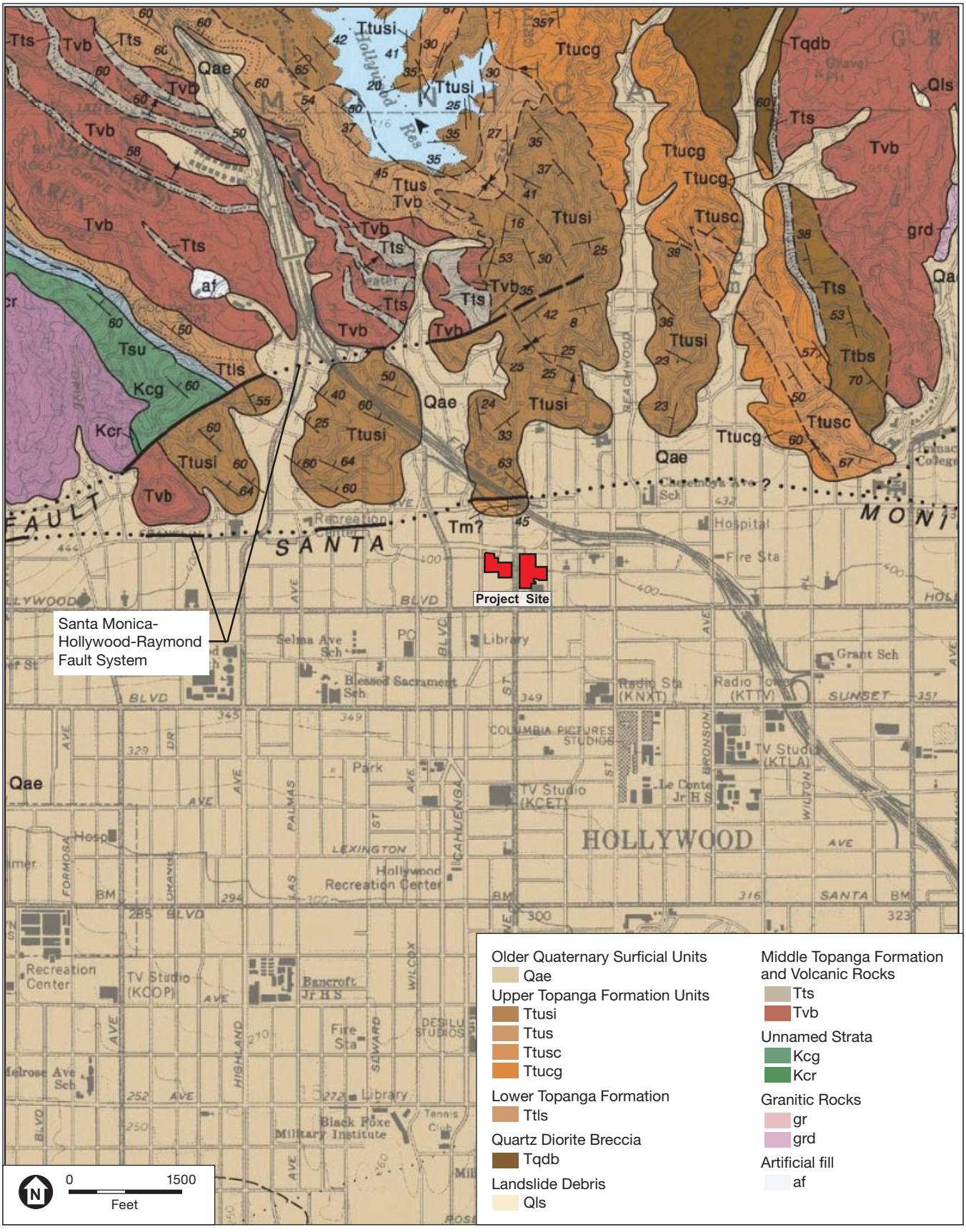
(1) Site Geology

(a) Generalized Subsurface Conditions

The Project Site generally slopes towards the south with an approximate relief of 25 feet from north to south. On-site drainage primarily occurs by sheet flow towards the south and into existing drainage systems. As noted above, on-site subsurface conditions were evaluated through field exploration data obtained from hollow-stem auger borings, cone penetration tests, and trenches.

As previously discussed, numerous investigations have been conducted on and near the Project Site. The description of geologic conditions in the previous investigations have some variation in the names, locations, and extents of geologic units. The summary of on-site geologic conditions provided below uses the 2015 and 2019 Fault Studies investigation results because the fault studies are recent on-site investigations and included the use of trenches that provided a more detailed evaluation of site conditions, including the age-dating of specific geologic units.

13 Quaternary time is from the present to 1.6 million years before present time.
14 Holocene time is from the present to 11,700 years before present time.



SOURCE: Feffer, 2019

Hollywood Center Project

Figure IV.D-1
Regional Geologic Map

The subsurface conditions as encountered and described in the 2015 and 2019 Fault Studies included the following generalized stratigraphic units from shallow and younger to deeper and older:

- Artificial fill (Qaf)
- Cahuenga/Argyle Sand (Qs)
- Cahuenga/Argyle Mudflow (Qm)
- Older Alluvium (Qoal)
- Modelo Formation sedimentary bedrock (Tm)
- Topanga Formation sedimentary and basaltic bedrock (Tt).

The main stratigraphic units are discussed below in stratigraphic order from ground surface to depth.

Fill – Artificial fill is artificially reworked or disturbed earth material and debris. The fill encountered varies in thickness between one to ten feet below ground surface (bgs).

Cahuenga/Argyle Sand – The sand deposit is encountered below the artificial fill at the East Site and portions of the West Site, thickening from 0 to about 20 feet toward the south. This sand unit consists of sands and gravels with varying lesser amounts of silt and clay. The 2015 Fault Study age-dated samples within this unit between about 4,170 years before present at about 14 feet bgs and 4,430 years before present at about 23 feet bgs, which would be within Holocene time. The 2015 Fault Study did not observe fault movement within this sand unit.

Cahuenga/Argyle Mudflow – The mudflow unit is encountered below the sand deposits at the East Site and portions of the West Site. This mudflow unit consists mostly of clay with variable amounts of silt and sand and lesser amounts of gravel. The 2015 Fault Study noted much of the top of the mudflow unit has been eroded and only part of the deposit is preserved. The 2015 Fault Study estimates the age of the mudflow unit to range from 80,000 to 125,000 years before present, placing it within Pleistocene time.[15] Trenches evaluated for the 2015 and 2019 Fault Studies exposed un-faulted pre-Holocene soil horizons estimated to be at least 120,000 and 200,000 years old, meaning that the Project Site has not experienced fault movement in at least the last 120,000 years.

Older Alluvium - The older alluvium consists of interbedded layers of alluvium, massive debris flows, and fluvial[16] layers that include all grain sizes from clay to boulders. The 2015 Fault Study estimates the age of the Older Alluvium to range from 150,000 to greater than 200,000 years before present, which also places the

15 Pleistocene time is from 11,700 to 1.6 million years before present time.
16 Fluvial units are formed in rivers.

Older Alluvium unit in Pleistocene time. Fault movement was observed within the older deeper portions of the Older Alluvium unit that predate 200,000 years before present.

Modelo Formation Bedrock – Miocene[17] age bedrock consisting of interbedded claystone, siltstone, and sandstone was encountered during the 2015 Fault Study and 2019 Geotechnical Investigation at depths ranging from about 40 to 85 feet bgs beneath the East Site. The Modelo Formation has an east-west fault located north of the Project Site. Faulting in the Modelo Formation would have occurred after the Modelo Formation was deposited in Miocene time but not after 200,000 years before present.

Topanga Formation Bedrock – Miocene age bedrock consisting of basalt and silty sandstone was encountered during the 2015 and 2019 Fault Studies and 2019 Geotechnical Investigation at depths ranging from about 30 to 65 feet bgs beneath the West Site. Although a specific fault plane was not observed in the Topanga materials encountered during the fault studies, the materials were observed to be highly fractured. Therefore, the Topanga Formation materials experienced seismic events and fault movement after the materials were deposited in Miocene time but not after 200,000 years before present.

(b) Geological Context for Paleontological Resources

As discussed above, fill at the Project Site is underlain by Holocene- and Pleistocene-aged alluvium, overlying Miocene bedrock formations at depth. These geologic units are discussed below from a paleontological perspective.

Younger Alluvium (Cahuenga/Argyle Sand and Mudflow) - The 2015 Fault Study conducted on the East Site of the Project Site dated the sands as Holocene alluvium, with radiocarbon dates ranging from 4,170 to 4,430 years before present. The Society of Vertebrate Paleontologists (SVP) guidance, described further below in Subsection IV.D.3.b, Methodology, identifies fossils of 5,000 years in age or older as potentially significant. The Natural History Museum of Los Angeles County (NHMLAC) has records of fossil resources recovered from similar sediments as shallow as 5 to 6 feet bgs within a few miles of the Project Site. Paleontological sensitivity for deposits that are mid-Holocene (5,000 years before present) or older is accepted for these sediments.

Older Alluvium – The 2015 and 2019 Fault Studies conducted on the East Site and West Site, respectively, dated soil development duration ranging from 120,000 to over 200,000 years. Pleistocene alluvium has a rich fossil history in Los

[17] Miocene time is from 5.3 million to 24 million years before present time.

Angeles[18,19] and throughout Southern California.[20,21,22] The most common fossils include the bones of mammoth, bison, horse, lion, cheetah, wolf, camel, antelope, peccary, mastodon, capybara, and giant ground sloth, as well as small animals, such as rodents and lizards.[23] In addition to illuminating the striking differences between Southern California in the Pleistocene and today, this abundant fossil record has been vital in studies of extinction[24,25], ecology[26], and climate change.[27]

Modelo Formation - Regional mapping recognizes outcrops of bedrock north of the Project Site as Monterey Formation in this area (the Modelo Formation is also called the Monterey Formation in other areas).[28] The Monterey Shale has yielded a diverse fauna consisting of some mollusks;[29] common fish skeletons[30,31]; remains of larger marine macrofauna, such as whales;[32] and the giant extinct

18 Brattstrom, B. H. and A. Sturn, A new species of fossil turtle from the Pliocene of Oregon, with notes on other fossil Clemmys from western North America. Bulletin of the Southern California Academy of Sciences 58, 1959, pp. 65-71.

19 Steadman, D. W., A Review of the osteology and paleontology of turkeys (Aves: Meleagridinae). Contributions in Science, Natural History Museum of Los Angeles County 330, 1980, pp. 131-207.

20 Jefferson, G.T., A catalogue of Late Quaternary Vertebrates from California: Part One, nonmarine lower vertebrate and avian taxa. Natural History Museum of Los Angeles County Technical Reports No. 5, 1991.

21 Miller, W. E., Pleistocene Vertebrates of the Los Angeles Basin and Vicinity: exclusive of Rancho La Brea. Los Angeles County Museum of Natural History, No. 10, 1971.

22 Scott, E. and S. Cox, Late Pleistocene distribution of Bison (Mammalia; Artiodactyla) in the Mojave Desert of Southern California and Nevada. In Wang, X. and L. Barnes, eds. Geology and Vertebrate Paleontology of Western and Southern North America. Natural History Museum of Los Angeles County, Science Series 41, 2008, pp. 359-382.

23 Graham, R.W. and E.L. Lundelius, FAUNMAP: A database documenting the late Quaternary distributions of mammal species in the United States. Illinois State Museum Scientific Papers XXV(1), 1994.

24 Sandom, C., S. Faurby, B. Sandel, and J. C. Svenning, Global late Quaternary megafauna extinctions linked to humans, not climate change. Proceedings of the Royal Society B 281, 2014, p. 9.

25 Scott, E., Extinctions, scenarios, and assumptions: Changes in latest Pleistocene large herbivore abundance and distribution in western North America. Quaternary International 217, 2010, pp. 225-239.

26 Connin, S., J. Betancourt, and J. Quade, Late Pleistocene C4 plant dominance and summer rainfall in the Southwestern United States from isotopic study of herbivore teeth. Quaternary Research 50, 1998, pp. 179-193.

27 Roy, K., J. Valentine, D. Jablonski, and S. Kidwell, Scales of climatic variability and time averaging in Pleistocene biotas: implications for ecology and evolution. Trends in Ecology and Evolution 11, 1996, pp. 458-463.

28 Dibblee, T.W. and Ehrenspeck, H.E., ed., Geologic Map of the Hollywood and Burbank (south 1/2) quadrangles, Los Angeles, California: Dibblee Geological Foundation, Map DF-30, 1991.

29 Bramlette, The Miocene Monterey Formation of California Revisited, 1946.

30 Bramlette, The Miocene Monterey Formation of California Revisited, 1946.

31 Dibblee, T.W., Stratigraphy of the southern Coast Ranges near the San Andreas Fault from Cholame to Maricopa, California. U.S. Geological Survey Professional Paper 764, 1973, p. 53.

32 Pyenson, N. D. and D. M. Haasl, Miocene whale-fall from California demonstrates that cetacean size did not determine the evolution of modern whale-fall communities. Biology Letters 3, 2007, pp. 709-711.

Desmostylus;[33] as well as birds,[34] crocodiles,[35] and rare land organisms, such as horse and land plants.[36]

Topanga Formation. Fossils found in the sedimentary portions of the Topanga Formation (siltstone at the Project Site) include numerous invertebrate and vertebrate remains from both marine and terrestrial settings, including sharks, bony fishes, birds, whales, dolphins, and land mammals.[37,38,39,40]

(2) Expansive Soils

Expansive soils are soils that swell when subjected to moisture and shrink when dried. Expansive soils are typically associated with clayey soils. When not addressed, soil expansion can have adverse effects on structures. The field soil classifications and laboratory testing indicated that the near surface soils have a low to medium potential for expansion.[41]

(3) Geologic Hazards

(a) Faulting and Seismicity

A fault is a fracture in the crust of the earth along which rocks or sediment on one side has moved relative to those on the other side.[42] Faults are the result of excessive strain cause by compression or extension within the earth's crust over long periods of time. A fault trace is the line on the earth's surface representing the

33 Hannibal, H., Notes on Tertiary Sirenians of the genus Desmostylus. Journal of Mammalogy 3, 1922, pp. 238-240.

34 Warheit, K. I., A Review of the Fossil Seabirds from the Tertiary of the North Pacific: Plate Tectonics, Paleoceanography, and Faunal Change. Paleobiology 18, 1992, pp. 401-424.

35 Barboza, M., J. Parham, G.-P. Santos, B. N. Kussman, and J. Velez-Juarbe, The age of the Oso Member, Capistrano Formation, and a review of fossil crocodylians from California. PaleoBios 34, 2017, pp. 1-16.

36 Bramlette, The Miocene Monterey Formation of California Revisited, 1946.

37 Morton, D.M. and F.K. Miller, Geologic Map of the San Bernardino and Santa Ana 30' x 60' quadrangles, California, U.S. Geological Survey Open-File Report 2006-1217, 2006.

38 Boessenecker, R.W. and M. Churchill, The oldest known fur seal. Biology Letters 11:20140835, 2015.

39 Campbell, R.H. and R.F. Yerkes, Geologic guide to the stratigraphy & structure of the Topanga Group, central Santa Monica Mountains, Southern California. The Los Angeles Basin Geological Society, Guidebook Number 49, 1980.

40 Whistler, D.P. and E.B. Lander, New late Uintan to early Hemingfordian land mammal assemblages from the undifferentiated Sespe and Vaqueros Formations, Orange County, and from the Sespe and equivalent marine formations in Los Angeles, Santa Barbara, and Ventura Counties, Southern California. Bulletin of the American Museum of Natural History 279, 2003, pp. 231-268.

41 Feffer Geological Consulting, Geotechnical Investigation for EIR, Hollywood Center Development, 1733-1741 Argyle Avenue; 6236 and 6334 West Yucca Street; 1720-1730, 1740, 1745-1760, and 1762-1770 N. Vine Street; 1746, 1748-1754, 1760, and 1764 N. Ivar Avenue, Hollywood Area City of Los Angeles, California, September 23, 2019. See Appendix G-3 of this Draft EIR.

42 CGS, Earthquake Fault Zones, A Guide For Government Agencies, Property Owners / Developers, and Geoscience Practitioners for Assessing Fault Rupture Hazards in California, Special Publication 42, 2018.

fault location. Surface rupture occurs when movement along a fault causes ground displacement at the surface. Fault rupture may occur suddenly during an earthquake or slowly in the form of a fault creep. Sudden displacements are more damaging to structures because they are accompanied by shaking. Fault creep is the slow displacement (movement) of the earth's crust.

Terms, such as "potentially active" and "inactive," have been commonly used in the past to describe faults that do not meet the State Mining and Geology Board (SMGB) definition of "active fault." However, these terms have the potential to cause confusion from a regulatory perspective as they are not defined in the Alquist-Priolo Earthquake Fault Zoning Act and may have other non-regulatory meanings in the scientific literature or in other regulatory environments. In order to avoid these issues, below are terms that provide added precision when used in classifying faults regulated by the Alquist-Priolo Earthquake Fault Zoning Act. Faults are classified into three categories on the basis of the absolute age of their most recent movement:

1) Holocene-active faults: Faults that have moved during the past 11,700 years. This age boundary is an absolute age (number of years before present).

2) Pre-Holocene faults: Faults that have not moved in the past 11,700 years and, thus, do not meet the criteria of "Holocene-active fault" as defined in the Alquist-Priolo Earthquake Fault Zoning Act and SMGB regulations. This class of fault is not regulated under the Alquist-Priolo Earthquake Fault Zoning Act.

3) Age-undetermined faults: Faults where the recency of fault movement has not been determined. Faults can be "age-undetermined" if the fault in question has simply not been studied in order to determine its recency of movement. Faults can also be age-undetermined due to limitations in the ability to constrain the timing of the recency of faulting. Examples of such faults are instances where datable materials are not present in the geologic record, or where evidence of recency of movement does not exist due to stripping (either by natural or anthropogenic processes) of Holocene-age deposits. Within the framework of the Alquist-Priolo Earthquake Fault Zoning Act, age-undetermined faults within regulatory Earthquake Fault Zones are considered "Holocene-active" until proven otherwise.

Earthquake Fault Zones are regulatory zones (also known as Alquist-Priolo Earthquake Fault Zones) that encompass traces of Holocene-active faults to address hazards associated with surface fault rupture. Earthquake Fault Zones are delineated by the State Geologist and implemented by lead agencies through permitting, inspection and land-use planning activities (PRC Chapter 7.5, Section 2621).

CGS policy is to delineate a boundary zone on both sides of a potential Holocene fault trace, called the Earthquake Fault Zone. The delineated width of an Earthquake Fault Zone is based on the location precision, complexity, or regional significance of the fault and ordinarily one-quarter mile or less in width. On November 6, 2014, CGS released the official map of the Earthquake Zones of Required Investigation for the Hollywood Quadrangle. This map indicates the Project Site is located within the Alquist-Priolo Earthquake Fault Zone for the Hollywood Fault, as shown on **Figure IV.D-2**, *Earthquake Fault Zones Map*.

If a Project Site lies within a designated Alquist-Priolo Earthquake Fault Zone, as is the case with the Project, issuance of a development permit requires a geologic fault rupture investigation that demonstrates a proposed building site is not threatened by surface displacement from the fault.[43] Accordingly, and as previously indicated, the 2015 and 2019 Fault Studies were prepared for the Project Site pursuant to the requirements of the Alquist-Priolo Earthquake Fault Zoning Act, and serves as the basis for the analysis of potential risk of fault rupture provided in this section of the Draft EIR.

The location of the Project Site with respect to regional faults with the potential for future seismic activity is provided in **Figure IV.D-3**, *Regional Faults Map*.[44] The source for this map covers the entire state and identifies faults on a regional scale. The Project Site is located within an Earthquake Zone of Required Investigation.[45]

The nearest significant active fault to the Project Site is the Hollywood Fault. This fault is projected to trend east-west over ten miles in length and is considered to be a segment of the Santa Monica-Hollywood-Raymond Fault Zone, which extends over 30 miles across the southern limb of the Santa Monica Mountains. The Hollywood Fault is a reverse strike-slip fault[46] capable of producing a potential maximum moment magnitude (Mw) 6.7 earthquake.

The two closer scale fault maps (Figures IV.D-1 and IV.D-2) show the Hollywood Fault segment of the Santa Monica-Hollywood-Raymond Fault System but with different interpretations of the location of the fault traces. The Hollywood Fault trace shown in Figure IV.D-1 shows one trace passing east-west north off the Project Site.

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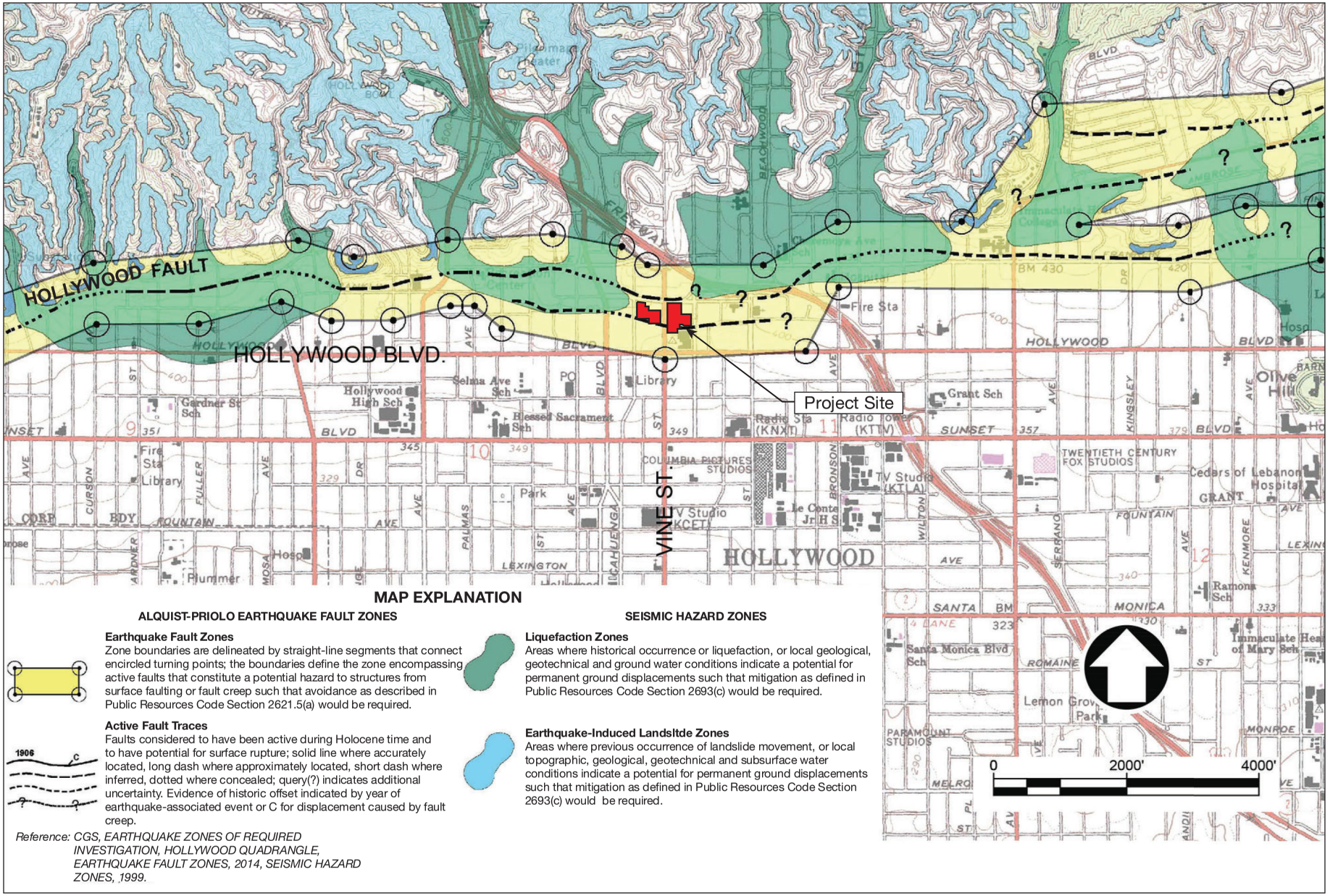
43 CGS, Earthquake Fault Zones, A Guide For Government Agencies, Property Owners / Developers, and Geoscience Practitioners for Assessing Fault Rupture Hazards in California, Special Publication 42, 2018.

44 CGS, Fault Activity Map of California, 2010.

45 CGS, Earthquake Zones of Required Investigation, Hollywood Quadrangle, November 6, 2014.

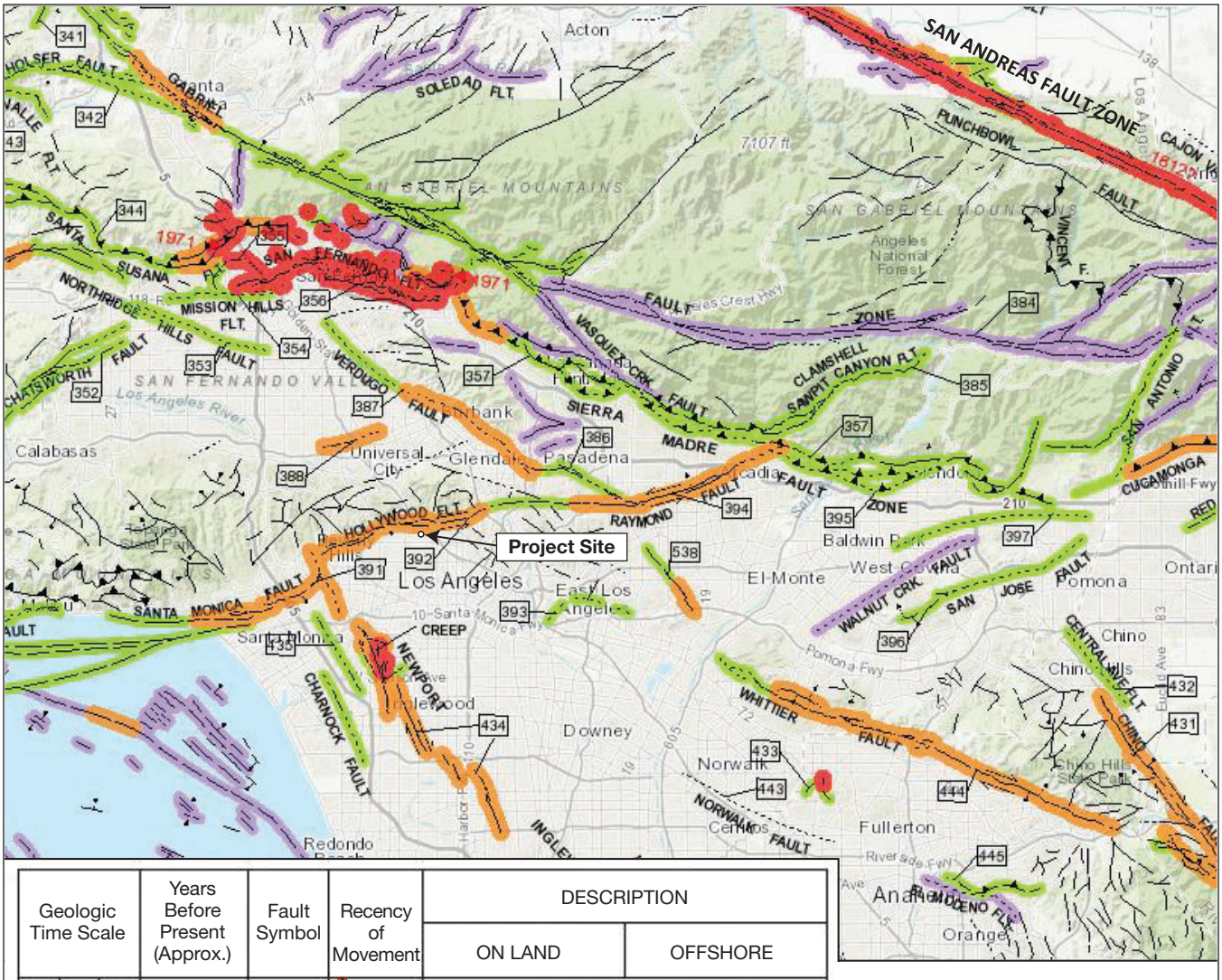
46 Strike-slip faults are vertical (or nearly vertical) fractures where the blocks have mostly moved horizontally. If the block opposite an observer looking across the fault moves to the right, the slip style is termed right lateral; if the block moves to the left, the motion is termed left lateral. Source: USGS Website, Earthquake Hazards Program, Earthquake Glossary, https://earthquake.usgs.gov/ learn/glossary/?term=strike-slip, accessed March 11, 2020.



SOURCE: 2014 Alquist-Priolo Fault Zone Map

Hollywood Center Project

Figure IV.D-2
Earthquake Fault Zones Map



Geologic Time Scale			Years Before Present (Approx.)	Fault Symbol	Recency of Movement	DESCRIPTION: ON LAND	DESCRIPTION: OFFSHORE
Quaternary	Late Quaternary	Holocene Historic				Displacement during historic time (e.g., San Andreas Fault 1906), includes areas of known fault creep.	
			200				
		Holocene				Displacement during Holocene time	Fault offsets seafloor sediments or strata of Holocene age.
			11,700				
		Pleistocene				Faults showing evidence of displacement during late Quaternary time	Faults cut strata of late Pleistocene age.
	Early Quaternary		700,000			Undivided Quaternary faults – most faults in this category show evidence of displacement during the last 1.6 million years; possible exceptions are faults which displace rocks of undifferentiated Plio-Pleistocene age.	Faults cut strata of Quaternary age.
			1,600,00				
Pre-Quaternary						**Faults without recognized Quaternary displacement or showing evidence of no displacement during Quaternary time. Not necessarily inactive.**	**Faults cut strata of Pliocene or older age.**
			4.5 billion Age of Earth)				

*Quaternary now recognized as extending to 2.6 million years ago. Quaternary faults in this map were previous 1.6 million years ago criterion.

N

0 10

Miles

D170105.00

SOURCE: CGS, 2019

Hollywood Center Project

Figure IV.D-3
Regional Faults Map

This fault trace location is based on geologic mapping documented in 1991,[47] as presented in the 2019 Geotechnical Investigation. The 2014 Alquist-Priolo fault map presented in Figure IV.D-3 shows two traces of the Hollywood Fault near the Project Site. One trace is mapped across Yucca Street approximately 50 feet north of the Project Site boundary, trending east-west. The second trace is mapped along the southern border of the Project Site, also trending east-west. However, as previously discussed above and in more detail under the heading "Ground Surface Rupture" below, the 2015 and 2019 Fault Studies for the Project Site, which are informed by specific investigations of and on the Project Site, indicate that no Holocene-active faulting occurs beneath or extends toward the Project Site, including the Hollywood Fault.

As Figure IV.D-3 shows other significant seismically active faults in the region near the Project Site, including the Newport-Inglewood, Verdugo, Sierra Madre, and Whittier Faults. The Newport-Inglewood Fault Zone is located approximately 5.7 miles southwest of the Project Site, trending northwest over 40 miles in length. The fault traces that comprise the Newport-Inglewood Fault Zone are estimated to be right-lateral strike-slip faults[48] capable of producing a potential maximum Mw 7.5.[49] The Verdugo Fault is located approximately six miles north of the Project Site, trending northwest over 13 miles in length. The Verdugo Fault is estimated to be a reverse fault[50] and is considered capable of producing earthquakes with a potential maximum Mw 6.9. The Sierra Madre Fault is located approximately 11 miles northeast of the Project Site, trending northwest over 47 miles in length. The Sierra Madre Fault is estimated to be a reverse fault and is considered capable of producing earthquakes with a potential maximum Mw 7.3. The northern extent of the right-lateral strike-slip Whittier Fault is located about 20 miles south east of the Project Site and is considered capable of producing earthquakes with a potential maximum Mw 6.0 to 7.2. The Elsinore Fault extends further south of the Whittier Fault and is considered capable of producing earthquakes with a potential maximum Mw 6.5 to 7.5.

47 Dibblee, T.W. and Ehrenspeck, H.E., ed., Geologic Map of the Hollywood and Burbank (south 1/2) quadrangles, Los Angeles, California: Dibblee Geological Foundation, Map DF-30, 1991.

48 When straddling a right-lateral strike slip fault, the right block moves toward you and the left block moves away, with little to no vertical movement.

49 Group Delta Consultants, Updated Geotechnical Feasibility Report, Proposed High-Rise Residential Development, 6220 West Yucca Street, Hollywood District, Los Angeles, California, Section 4.2, October 22, 2015, pp. 7-8.

50 Dip-slip faults are included fractures where the blocks have mostly shifted vertically. If the rock mass above an inclined fault moves down, the fault is termed normal, whereas if the rock above the fault moves up, the fault is termed a reverse fault. Source: USGS Website, Earthquake Hazards Program, Earthquake Glossary, https://earthquake.usgs.gov/learn/glossary/?term=dip%20slip, accessed July 25, 2019.

The San Andreas Fault Zone is the largest fault zone within the Southern California area and is capable of producing large earthquakes. This fault zone is a strike slip[51] plate boundary that traverses over 800 miles along the western side of California. The San Andreas Fault Zone is located approximately 33 miles northeast of the Project Site. The zone of faulting nearest the Project Site is known as the Mojave segment of the San Andreas Fault Zone. A significant earthquake scenario on this fault may trigger a series of earthquakes on surrounding regional faults affecting the Los Angeles area at large. The recurrence interval of the Mojave segment is considered by CGS to be approximately every 140 years. The last major earthquake event on this fault in the Southern California area was in 1857, with an estimated potential maximum Mw 7.9.

Other nearby regional faults include the Upper Elysian Park Fault, Puente Hills Fault and Northridge Fault. The Upper Elysian Park Fault is estimated to be about two miles east of the Project Site, and the Puente Hills Fault is about five miles south of the Project Site in the area in between the Newport, Hollywood, and Whittier Faults. Both faults are blind thrust faults that trend northwest and dip shallowly to the northeast and are considered to be blind thrust faults. The Northridge thrust fault is a blind thrust fault that underlies a large area of the San Fernando Valley, and is located approximately 16 miles north of the Project Site.[52]

As discussed above, blind thrust faults have the potential for surface deflection deformation and folding during earthquakes. While they do produce earthquakes, their rupture planes lie below the ground surface and, therefore, are not regulated and are not considered for surface fault rupture hazard by the Alquist-Priolo Earthquake Fault Zoning. Because the fault planes do not extend to the surface, the fault traces are not shown in Figure IV.D-3. A potential maximum Mw 6.7 is estimated for these blind thrust faults.

Local historical earthquakes recorded from 1933 to present within a 62-mile radius of the Project Site include 41 recorded events with magnitudes greater than Mw 5.0.[53] Of the 41 events, four were Mw 6.0 and greater. Significant historical earthquake epicenters nearest the Project Site include ruptures along the Elsinore, Newport-Inglewood, Raymond, and Northridge faults. Two historical earthquakes are estimated to have had epicenters located along the Elsinore Fault Zone -- one in 1910 estimated to a Mw 6.0 located near Temescal

51 Strike-slip faults are vertical (or nearly vertical) fractures where the blocks have mostly moved horizontally. If the block opposite an observer looking across the fault moves to the right, the slip style is termed right lateral; if the block moves to the left, the motion is termed left lateral. Source: USGS Website, Earthquake Hazards Program, Earthquake Glossary, https://earthquake.usgs.gov/learn/ glossary/?term=strike-slip, accessed July 25, 2019.

52 United States Geological Survey website, U.S. Quaternary Faults Map, https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=5a6038b3a1684561a9b0aadf88412fcf. Accessed March 2020.

53 Group Delta Consultants, Updated Geotechnical Feasibility Report, Proposed High-Rise Residential Development, 6220 West Yucca Street, Hollywood District, Los Angeles, California, Section 4.2, October 22, 2015, pp. 7-8.

Valley and the second in 1987 estimated to be Mw 5.9 located just south of Pasadena. In 1933, an estimated Mw 6.4 earthquake ruptured along the Newport-Inglewood Fault Zone near Newport Beach. In 1988, an estimated Mw 5.0 earthquake ruptured along the Raymond Fault Zone near Pasadena. In 1994, an estimated Mw 6.7 earthquake ruptured along the Northridge Blind Thrust Fault (Pico Thrust) near Northridge and reportedly triggered lesser ruptures on nearby faults.

(b) Ground Surface Rupture

As noted above, the Project Site is located within the Alquist-Priolo Earthquake Fault Zone for the Hollywood Fault. Within the Hollywood Fault Zone, there is evidence of Holocene-activity, and, therefore, the zone is considered active. As such, this fault zone is considered to have a potential for future earthquakes capable of producing future ground surface ruptures.[54] However, it should be noted that the Alquist-Priolo Earthquake Fault Zone map is focused at a regional scale. The previously discussed site-specific 2015 and 2019 Fault Studies, prepared as required pursuant to the Alquist-Priolo Earthquake Fault Zoning Act, indicate no Holocene-age fault movement below the Project Site.

The 2014 Alquist-Priolo fault mapped location of the Hollywood Fault trace within the vicinity of the Project Site is largely based on historical geomorphic evidence of south-facing tectonic fault scarps[55] along the southern foothills of the Santa Monica Mountains. A portion of the Project Site is located on a steepened alluvial fan surface, interpreted by CGS as a possible tectonic fault scarp. In addition, a significant groundwater level variance in the area was interpreted as possible evidence of the presence of faulting within the Project Site area.

The 2015 and 2019 Fault Studies conducted for the Project Site, along with fault investigations conducted for projects in the surrounding areas, including sites north and west of the Project Site, indicate there is no active faulting beneath or extending toward the Project Site.[56] The interpreted tectonic fault scarp the Project Site, shown on the 2014 Alquist-Priolo fault map, was investigated and determined

54 Group Delta Consultants, Updated Geotechnical Feasibility Report, Proposed High-Rise Residential Development, 6220 West Yucca Street, Hollywood District, Los Angeles, California, Section 4.2, October 22, 2015.

55 The fault scarp is a feature on the surface of the earth that looks like a step caused by slip on the fault. Source: USGS Website, Earthquake Hazards Program, Earthquake Glossary, https://earthquake.usgs.gov/learn/glossary/?term=fault%20scarp, accessed October 16, 2019.

56 Group Delta Consultants, Fault Activity Investigation, East and West Millennium Sites 1733-1741 Argyle Avenue; 6236 and 6334 West Yucca Street; 1720-1730, 1740, 1745-1760, and 1762-1770 N. Ivar Avenue, Hollywood Area, City of Los Angeles, California, March 6, 2015, p. 10. See Appendix G-1 of this Draft EIR. Group Delta Consultants, Surface Fault Rupture Hazard Evaluation Report, Hollywood Tract, Block 21, Lots 1 and FR2 [APN 5546004029], 6334 W Yucca Street And 1770 N Ivar Avenue and Recommendations For 50-Foot Setback Removal at Hollywood Tract, Block 21, Lot 3 [APN 5546004008] And Central Hollywood Tract No. 2, Lot FR6 [APN 5546030034], 1760 And 1764 N Ivar Avenue And 1720, 1722, And 1734 N Vine Street, Los Angeles, California, July 19, 2019, p. 10. See Appendix G-2 of this Draft EIR.

to be a buried nose of a ridgeline extending south from the Santa Monica Mountains. The hypothesized scarp was determined to be an erosional south-facing slope and not fault-related. Groundwater level variance in the area was determined to be depositionally-controlled due to the impermeable underlying sloped bedrock and not due to faulting.

Stratigraphic and structural data correlated from adjacent sites indicate no fault movement in at least the last 80,000 years. A pre-Holocene "mud flow" deposit was encountered continuously from the area of Argyle Avenue north of Yucca Street and west of Argyle Avenue south of Yucca Street to at least the southern extent of the East Site and most of the West Site (2015 Fault Study). A continuous, unfaulted 120,000-year-old soil profile was encountered during investigations in the remaining northern portion of the West Site (2019 Fault Study). This continuous pre-Holocene stratigraphy precludes the possibility of active faulting underlying these the Project Site.

(c) Site Stability - Liquefaction, Lateral Spreading, and Seismic Settlement

Liquefaction involves the sudden loss in strength of a saturated, cohesionless soil caused by the build-up of pore water pressure during cyclic loading, such as that produced by an earthquake. This increase in pore water pressure can temporarily transform the soil into a fluid mass, resulting in vertical settlement and can also cause lateral ground deformations (lateral spreading). Typically, liquefaction occurs in areas where there are loose to medium dense non-cohesive soils and the depth to groundwater is less than 50 feet from the surface. Seismic shaking can also cause soil compaction and ground settlement without liquefaction occurring, including settlement of dry sands above the water table.[57]

According to the State of California Seismic Hazard Zones Map of the Hollywood Quadrangle (Figure IV.D-2), the Project Site is not located within a State of California seismic hazard liquefaction zone. According to City of Los Angeles General Plan Safety Element, Exhibit B, the Project Site is located within an area susceptible to liquefaction. However, this map presents generalized information for planning purposes, and is not based on specific site analyses.

As discussed in SP 117A,[58] the vast majority of liquefaction hazards are associated with sandy soils and silty soils of low plasticity, or low clay content This is because soils with a lot of sand and silt sized grains that have not been compacted will have many pore spaces in between the grains. Seismic shaking

[57] Group Delta Consultants, Updated Geotechnical Feasibility Report, Proposed High-Rise Residential Development, 6220 West Yucca Street, Hollywood District, Los Angeles, California, Section 4.2, October 22, 2015.

[58] CGS, Guidelines for Evaluating and Mitigating Seismic Hazards in California, Special Publication 117A, 2008.

can cause those grains to reorganize and compact. Cohesive soils are generally not considered susceptible to soil liquefaction because they are more compacted and less susceptible to rearrangement. Based on site-specific soil investigations, the potential for liquefaction at the Project Site during earthquake shaking is considered to be negligible.[59]

The 2019 Geotechnical Investigation indicates that the consolidation or settlement and hydrocollapse potential of the alluvium to a depth of 110 feet is low. The in-situ dry densities[60] are high for the samples taken at the foundation level, resulting in a very low potential for consolidation and soil settlement.[61] Based on site-specific soil investigations, the potential for liquefaction at the Project Site during earthquake shaking is considered to be negligible.[62]

(d) Landslide and Seismically Induced Slope Instability

Landslides are movements of surface material down a slope.[63] The Project Site has less than 25 feet of overall elevation change at a gradient that is more gentle than 10:1 (horizontal to vertical).[64] A slope stability analysis is not required for the property per LADBS Information Bulletin P/BC 2017-49. A stability evaluation is not required for cut, fill, and natural slopes whose gradient is less than two horizontal to one vertical (2:1). The Project Site is not located within a designated landslide area, as shown in the Los Angeles General Plan Safety Element, Exhibit C, Landslide Inventory and Hillside Areas in the City of Los Angeles.[65] In addition, according to the Geotechnical Investigation, the potential for landsliding and seismically induced slope instability at the Project Site is considered low.

59 Feffer Geological Consulting, Geotechnical Investigation for EIR, Hollywood Center Development, 1733-1741 Argyle Avenue; 6236 and 6334 West Yucca Street; 1720-1730, 1740, 1745-1760, and 1762-1770 N. Vine Street; 1746, 1748-1754, 1760, and 1764 N. Ivar Avenue, Hollywood Area City of Los Angeles, California, September 23, 2019, p. 9. See Appendix G-3 of this Draft EIR.

60 In-situ dry density is a measure of the level of compaction or consolidation.

61 Feffer Geological Consulting, Geotechnical Investigation for EIR, Hollywood Center Development, 1733-1741 Argyle Avenue; 6236 and 6334 West Yucca Street; 1720-1730, 1740, 1745-1760, and 1762-1770 N. Vine Street; 1746, 1748-1754, 1760, and 1764 N. Ivar Avenue, Hollywood Area City of Los Angeles, California, September 23, 2019, p. 8. See Appendix G-3 of this Draft EIR.

62 Feffer Geological Consulting, Geotechnical Investigation for EIR, Hollywood Center Development, 1733-1741 Argyle Avenue; 6236 and 6334 West Yucca Street; 1720-1730, 1740, 1745-1760, and 1762-1770 N. Vine Street; 1746, 1748-1754, 1760, and 1764 N. Ivar Avenue, Hollywood Area City of Los Angeles, California, September 23, 2019, p. 9. See Appendix G-3 of this Draft EIR.

63 USGS, Earthquake Hazards Program, Earthquake Glossary, https://earthquake.usgs.gov/learn/glossary/?term=landslide.

64 Feffer Geological Consulting, Geotechnical Investigation for EIR, Hollywood Center Development, 1733-1741 Argyle Avenue; 6236 and 6334 West Yucca Street; 1720-1730, 1740, 1745-1760, and 1762-1770 N. Vine Street; 1746, 1748-1754, 1760, and 1764 N. Ivar Avenue, Hollywood Area City of Los Angeles, California, September 23, 2019. See Appendix G-3 of this Draft EIR.

65 City of Los Angeles Department of City Planning, General Plan Safety Element, Exhibit C, Landslide Inventory and Hillside Areas in the City of Los Angeles, adopted November 26, 1996.

(e) Paleontological Resources

A database search for records of fossil localities within the Project Site was conducted by the LACM on April 26, 2018. The database search results indicated that no known localities exist within the Project Site; however, a number of vertebrate fossils from Older Quaternary Alluvium are known from within one mile of the Project Site (LACM 6297-6300). These localities have yielded specimens of horse (*Equus*), bison (*Bison*), camel (*Camelops*), and mastodon (*Mammut americanum*) between 47 feet to 80 feet bgs.

The geologic units within the Project Site were assigned paleontological sensitivity rankings based on the SVP guidelines. The fill within the Project Site has no paleontological sensitivity. However, due to the age of the alluvium beneath the fill (early Holocene and older), all of the sediments in the subsurface of the Project Site – alluvium and the Monterey Formation – have high paleontological sensitivity. No paleontological resources were identified within the Project Site.

(f) Erosion

Soil erosion refers to the process by which soil or earth material is loosened or dissolved and removed from its original location. Erosion can occur by varying processes and may occur in an area where bare soil is exposed to wind or moving water (both rainfall and surface runoff). The processes of erosion are generally a function of material type, terrain steepness, rainfall or irrigation levels, surface drainage conditions, and general land uses. Topsoil is used to cover bare surface areas for the establishment and maintenance of vegetation due to its high concentrations of organic matter and microorganisms.

The Project Site is located in a highly urbanized area of Los Angeles and is currently developed with the Capitol Records Complex and associated surface parking. Negligible, if any, native topsoil occurs on the Project Site as it is currently developed with structures and surface parking.

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to geology and soils if it would:

Threshold (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[66] Special Publication 42;

ii. Strong seismic ground shaking;

iii. Seismic-related ground failure, including liquefaction;

iv. Landslides;

Threshold (b): Result in substantial soil erosion or the loss of topsoil;

Threshold (c): Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse;

Threshold (d): Be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property;.[67]

Threshold (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 wastewater; or

Threshold (f): Directly or indirectly destroy a unique paleontological resource or site of unique geologic feature.

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions. The factors to evaluate geology and soils impacts include:

(1) Geologic Hazards

- Cause or accelerate geologic hazards, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury.

66 Now the CGS.

67 The CBC, based on the International Building Code and the now defunct Uniform Building Code, no longer includes a Table 18-1-B. Instead, Section 1803.5.3 of the CBC describes the criteria for analyzing expansive soils.

(2) Sedimentation and Erosion

- Constitute a geologic hazard to other properties by causing or accelerating instability from erosion; or

- Accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on-site.

(3) Landform Alteration

- Cause one or more distinct and prominent geologic or topographic features to be destroyed, permanently covered, or materially and adversely modified as a result of the project. Such features may include, but are not limited to, hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, and wetlands.

(4) Paleontological Resources

- Whether, or the degree to which, the project may result in the permanent loss of, or loss of access to, a paleontological resource.

- Whether the paleontological resource is of regional or statewide significance.

b) Methodology

(1) Geology and Soils

The analysis of impacts associated with geology and soils is based largely on the 2019 Geotechnical Investigation and the 2015 and 2019 Fault Studies reports prepared for the Project Site by Feffer Geological Consulting and Group Delta Consultants, included in Appendix G of this Draft EIR. As discussed above and in both investigation reports, information, conclusions, and recommendations in the reports were based on field exploration on the Project Site (i.e., exploratory soil borings with laboratory testing to determine the characteristics of the subsurface conditions at the Project Site, the excavation and logging of trenches to age-date specific soil profiles, and the construction of one monitoring well) and records review of prior geotechnical investigations.

The investigations evaluated the underlying geologic and soil conditions to determine the potential for the Project to directly or indirectly cause hazardous conditions and identified preliminary foundation requirements needed to ensure that new building construction is safe. Site borings and trenches were drilled or excavated at various locations across the Project Site to ensure coverage across the entire Project Site and evaluate conditions at all locations. The reports provide sufficient detail to determine whether the Project Site is suitable for the intended use and whether more detailed studies are required to address specific geological

issues. The reports also identify considerations to be taken into account in the design of building foundations.

According to LAMC Section 91.1803, a Final Geotechnical Report must also be prepared based on the final construction and building plans prepared by the Applicant and reviewed by the City prior to the issuance of building permits to construct the Project. Based on the ground conditions and building design, the Final Geotechnical Report will include specific recommendations for site preparation, excavation, foundation design and shoring/retaining wall specifications.

The Project would be regulated by the various laws, regulations, and policies summarized in the Regulatory Framework. Compliance by the Project with applicable federal, State, and local laws and regulations is assumed in this analysis, and local and state agencies would be expected to continue to enforce applicable requirements to the extent that they do so now. Note that compliance with many of the regulations is a condition of permit approval.

(2) Paleontological Resources

The analysis of paleontological resources in this section of the Draft EIR is summarized from the Paleontological Resources Assessment Report prepared by qualified ESA Cultural Resources Group personnel who meet and exceed the Society for Vertebrate Paleontology (SVP) Qualification Standards; the SVP Guidelines are discussed further below. The analysis is based on a review of the NHMLAC paleontological records search results and other documentation regarding disturbances to the Project Site and its subsurface geological conditions (e.g. the 2019 Geotechnical Investigations and 2015 and 2019 Fault Studies provided in Appendix G of this Draft EIR). The objective of the record search through the NHMLAC was to determine the geological formations underlying the Project Site, whether any paleontological localities have previously been identified within the Project Site or in the same or similar formations near the Project Site, and the potential for excavations associated with the Project to encounter paleontological resources. These methods are consistent with the SVP guidelines for assessing the importance of paleontological resources in areas of potential environmental effect.

Although no known resources were identified within the Project Site from the NHMLAC search, this did not preclude the possibility of previously unknown buried paleontological resources within the Project Site that may be impacted during construction of the Project. The potential to encounter paleontological resources during construction at the Project Site was determined by reviewing the results of the records search, the depth of native versus fill soils, land use history, past disturbances, and the proposed excavation parameters for the Project.

The SVP has established standard guidelines,[68,69] which outline professional protocols and practices for conducting paleontological resource assessments and surveys, monitoring and mitigation, data and fossil recovery, sampling procedures, and specimen preparation, identification, analysis, and curation. Most practicing professional vertebrate paleontologists adhere closely to the SVP's assessment, mitigation, and monitoring requirements pursuant to the standard guidelines. Most State regulatory agencies with paleontological resource-specific laws, ordinances, regulations, and standards (LORS) likewise accept and use the professional standards set forth by the SVP.

As defined by the SVP, significant paleontological resources are:[70]

> *Fossils and fossiliferous deposits[,] here restricted to vertebrate fossils and their taphonomic and associated environmental indicators. This definition excludes invertebrate or paleobotanical fossils except when present within a given vertebrate assemblage. [However,] [c]ertain invertebrate and plant fossils may be defined as significant by a project paleontologist, local paleontologist, specialists, or special interest groups, or by lead agencies or local governments.*

As defined by the SVP, significant fossiliferous deposits are:[71]

> A rock unit or formation which contains significant nonrenewable paleontologic resources, here defined as comprising one or more identifiable vertebrate fossils, large or small, and any associated invertebrate and plant fossils, traces, and other data that provide taphonomic, taxonomic, phylogenetic, ecologic, and stratigraphic information (ichnites and trace fossils generated by vertebrate animals, e.g., trackways, or nests and middens which provide datable material and climatic information). Paleontologic resources are considered to be older than recorded history and/or older than 5,000 years BP [before present].

Based on the above-cited significance definitions, all identifiable vertebrate fossils have scientific value and are therefore considered scientifically significant. This position is maintained because vertebrate fossils are relatively uncommon, and only rarely will a fossil locality yield a large number of specimens of the same genus; thus, abundance of fossils is not a requirement for designating a given rock

68 SVP, Assessment and Mitigation of Adverse Impacts to Nonrenewable Paleontologic Resources: Standard Guidelines, 1995.
69 SVP, Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources, 2010.
70 SVP, Assessment and Mitigation of Adverse Impacts to Nonrenewable Paleontologic Resources: Standard Guidelines, 1995.
71 SVP, Assessment and Mitigation of Adverse Impacts to Nonrenewable Paleontologic Resources: Standard Guidelines, 1995.

unit as a significant fossiliferous deposit. Therefore, every vertebrate fossil found has the potential to provide important new scientific information regarding the taxon it represents, its paleoenvironment, and/or its distribution. Furthermore, all geologic units that have previously yielded vertebrate fossils are considered to have high sensitivity for the presence of fossils in the future. Identifiable plant and invertebrate fossils are considered significant if found in association with vertebrate fossils or if defined as scientifically significant by project paleontologists, specialists, or local government agencies.

(a) Paleontological Sensitivity

Paleontological sensitivity is the potential for a geologic unit to produce scientifically significant fossils. This is determined by rock type, past history of the geologic unit in producing significant fossils, and fossil localities recorded from that unit; for this reason, paleontological sensitivity depends on the known fossil data collected from the entire geologic unit, not just a specific survey. The SVP[72] defines four categories of paleontological sensitivity or, per the SVP guidelines, potential, for the presence of paleontological resources – high, low, undetermined, and no potential – as follows:

- **High Potential.** Rock units that have yielded vertebrate or significant invertebrate, plant, or trace fossils are considered to have a high potential for containing additional significant paleontological resources. Rocks units classified as having high potential for producing paleontological resources include, but are not limited to, (1) sedimentary formations and some volcaniclastic formations (e. g., ashes or tephras [rock fragments and particles from volcanic eruptions]), (2) some low-grade metamorphic rocks which contain significant paleontological resources anywhere within their geographical extent, (3) and sedimentary rock units temporally or lithologically suitable for the preservation of fossils. The latter includes middle Holocene and older, fine-grained fluvial sandstones, argillaceous (i.e., clay-bearing) and carbonate-rich paleosols (rock units representing former, now lithified, soils), cross-bedded point bar sandstones, fine-grained marine sandstones, etc.

- **Low Potential.** Some rock units have been concluded to contain low potential for yielding scientifically significant fossils, based on field survey findings reported reports in the paleontological literature by qualified professional paleontologists. These conclusions may be based on the fact that certain rock units are poorly represented by fossil specimens in institutional collections, leading to the determination that they are not generally fossil-bearing, or on general scientific consensus that a given rock unit only preserves fossils in rare circumstances and their presence of fossils is an exception in such units, not the rule, as in basalt flows or colluvium deposited during Holocene time. Rock

72 SVP, Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources, 2010.

units with low potential typically do not require impact mitigation measures to protect fossils.

- **Undetermined Potential.** Rock units for which little information is available concerning their paleontological content, geologic age, and depositional environment are considered to have undetermined potential. Further study is necessary to determine if these rock units have high or low potential to contain significant paleontological resources. A field survey by a qualified professional paleontologist to specifically determine the paleontological resource potential of these rock units is required before development of a paleontological resource impact mitigation program. In cases where no subsurface data are available, strategically located excavations into subsurface stratigraphy can determine paleontological potential.

- **No Potential.** Some rock units have no potential to contain significant paleontological resources. An example is high-grade metamorphic rocks, which have typically been distorted or recrystallized through intense processes of heat or other stresses (e.g., gneisses and schists). Likewise, plutonic igneous rocks such as granite are considered to have no potential to yield fossils, as they are formed from (liquid) magma that has dissolved the original rock matrix including any fossils it may once have contained. Rock units with no potential to yield fossils require no protections; no impacts are anticipated on such units and no mitigation is not required.

For geologic units with high potential, full-time monitoring is appropriate during any project-related ground disturbance because of the risk to paleontological resources. For geologic units with low potential, protection or salvage efforts is not generally required because of the low risk of encountering paleontological resources. For geologic units with undetermined potential, accepted professional practice recommends field surveys conducted by a qualified vertebrate paleontologist to determine the paleontologic potential of the rock units present in the study area, which in turn prescribes how mitigation measures should be assigned.

c) Project Design Features

No specific Project Design Features are proposed with regard to geology, soils, seismicity, or paleontological resources.

d) Analysis of Project Impacts

Construction activities, including excavation depths, building footprint, and construction methods, would be essentially the same under the Project or the Project with the East Site Hotel Option. Accordingly, Project-related construction impacts would be essentially the same under the Project or the Project with the East Site Hotel Option. Thus, the conclusions regarding the construction impact

analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

Although the East Senior Building under the Project with the East Site Hotel Option would be two floors shorter than under the Project, both would similarly redevelop the Project Site. This difference in building height of the East Senior Building does not materially change the analysis of geology and soils impacts or paleontological resources impacts under the Project. Accordingly, Project operational impacts discussed in the analyses below would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

Threshold (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.

(1) Impact Analysis

As discussed above in the Existing Conditions section, the site-specific 2015 and 2019 Fault Studies included a soil profile horizons evaluation and other investigations that concluded that there is no active faulting beneath the Project Site or extending toward the Project Site. The underlying soil horizons indicate the Project Site has not experienced fault movement for at least 120,000 years. **Therefore, because the 2015 and 2019 Fault Studies concluded there is no active faulting beneath the Project Site, development of the Project or the Project with the East Site Hotel Option would not directly or indirectly cause substantial adverse effects, including risk of loss, injury, or death involving fault rupture, and, as such, the impact relative to fault rupture would be less than significant.**

(2) Mitigation Measures

Impacts regarding fault rupture were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding fault rupture were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

ii. Strong seismic ground shaking?

(1) Impact Analysis

As discussed above, the 2015 and 2019 Fault Studies and Geotechnical Investigations, which also reference various fault investigation studies conducted near the Project Site (see Subsection IV.D.1, Introduction, above), have concluded that there is no active faulting beneath the Project Site or extending toward the Project Site. However, the Project Site is located within the seismically active region of Southern California. The level of ground shaking that would be experienced at the Project Site from regional faults would be a function of several factors, including earthquake magnitude, type of faulting, rupture propagation path, distance from the epicenter, earthquake depth, duration of shaking, site topography, and site geology.

The Project would not involve mining operations, boring of large areas, or the extraction or injection of oil or groundwater that could create unstable seismic conditions that would directly or indirectly cause ground shaking. Moreover, as is true for any new project development in Los Angeles, the Project's building design and construction must conform to the current seismic design provisions of the City's Building Code, which incorporates relevant provisions of the CBC. The Los Angeles Building Code incorporates the latest seismic design standards for structural loads and materials to accommodate maximum ground accelerations expected from known faults. The 2019 Geotechnical Investigation provided preliminary site-specific design recommendations and parameters regarding grading and earthwork, temporary excavation and shoring, drainage, foundations, floor slab support, basement walls, and pavement design. The 2019 Geotechnical Investigation concluded that development of the Project is feasible from a geotechnical perspective, provided that the applicable regulations are met, and construction and design are performed in accordance with its recommendations, and that a design-level geotechnical report (or Final Geotechnical Report) will be required to develop geotechnical recommendations for final design. Per City Building Code and CBC requirements, prior to issuance of a grading permit, a qualified geotechnical engineer must prepare and submit to the LADBS a Final Geotechnical Report that includes site-specific design recommendations for

seismic safety and design requirements for foundations, retaining walls/shoring and excavation to meet applicable State and City regulatory requirements.

Thus, compliance with applicable regulatory requirements (i.e., the City of Los Angeles Building Code and the CBC) and incorporation of these recommendations would reduce the potential for significant damage to structures resulting from strong seismic ground shaking and the exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury or death, to the maximum extent practical. **Therefore, based on the above, development of the Project or the Project with the East Site Hotel Option would not directly or indirectly cause substantial adverse effects, including risk of loss, injury, or death involving strong seismic ground shaking hazards, and as such, the impact relative to ground shaking would be less than significant.**

(2) Mitigation Measures

Impacts regarding strong seismic ground shaking were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding strong seismic ground shaking were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

iii. Seismic-related ground failure, including liquefaction?

(1) Impact Analysis

As discussed above, according to the State of California Seismic Hazard Zones Map of the Hollywood Quadrangle (Figure IV.D-3), the Project Site is not located within a State of California seismic hazard liquefaction zone. The City's ZIMAS website also indicates the Project Site is not subject to liquefaction hazards.

According to the 2019 Geotechnical Investigation, site-specific liquefaction analysis indicates that the Project Site is mostly underlain by dense/stiff older alluvial soils that are not considered susceptible to liquefaction or lateral spreading. In addition, the subsurface soils are not considered susceptible to settlement or slope stability issues, such as consolidation and hydrocollapse.

In addition, substantial excavation within the Project Site during construction for subterranean parking, shoring, and ancillary uses, or improvements is planned at depths up to 82 feet bgs. Excavation activities would remove localized loose surficial deposits, if any. Further, excavations on-site would require suitable engineered stabilization in accordance with applicable City and CBC requirements. Application of appropriate engineering controls and compliance with applicable code and regulatory requirements for planned excavation and construction activities onsite would preclude site slope stability geologic hazards at the Project Site and protect surrounding developments. Per City Building Code requirements, prior to the issuance of a grading permit, a qualified geotechnical engineer must prepare and submit to the LADBS a Final Geotechnical Report that includes site-specific design recommendations for seismic safety and design requirements for foundations, retaining walls/shoring and excavation to meet applicable State and City regulatory requirements. **Therefore, based on the above, development of the Project or the Project with the East Site Hotel Option would not directly or indirectly cause potential substantial adverse effects, including risk of loss, injury, or death involving seismic-related ground failure hazards, including liquefaction, and as such, the impact relative to seismic-related ground failure would be less than significant.**

(2) Mitigation Measures

Impacts regarding seismic-related ground failure were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding seismic-related ground failure were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

iv. Landslides

As discussed above and in Subsection VI.6, *Impacts Found Not to be Significant*, and in the Initial Study (Appendix A) of this Draft EIR, due to the relatively flat nature of the Project Site (less than twenty-five feet of overall elevation change) and the fact that the Project Site is not located within a designated landslide area, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. **Therefore, no impact would occur with respect to Threshold (a)iv, and no further analysis is required.**

Threshold (b): Would the Project result in substantial soil erosion or the loss of topsoil?

(1) Impact Analysis

(a) Construction Impacts

Project construction would result in ground surface disruption during excavation, grading, and trenching that would create the potential for erosion to occur. However, wind erosion would be minimized through implementation of the soil stabilization measures required by SCAQMD Rule 403 (Fugitive Dust), such as daily watering (see Section IV.B, *Air Quality*, of this Draft EIR for further discussion). The potential for water erosion would be reduced by the implementation of standard erosion control measures during site preparation and grading activities, as discussed in more detail under Section IV.G, *Hydrology and Water Quality*, of this Draft EIR, since the Project would be subject to existing regulations associated with the protection of water quality. Construction activities would be conducted in accordance with applicable City standard erosion control practices required pursuant to the CBC and the requirements of the National Pollutant Discharge Elimination System (NPDES) Construction General Permit issued by the Los Angeles Regional Water Quality Control Board (LARWQCB), as applicable. In accordance with these requirements, a Stormwater Pollution Prevention Plan (SWPPP) would be prepared that incorporates Best Management Practices (BMPs) to control water erosion during the Project's construction period. Following construction, the Project Site would be covered completely by pavement, structures, and landscaping, which would not leave any exposed areas of bare soil susceptible to erosion. **Thus, in conjunction with compliance with applicable code and regulatory requirements, impacts associated with substantial erosion or loss of topsoil as a result of the Project or the Project with the East Site Hotel Option construction would be less than significant.**

(b) Operational Impacts

Once constructed, all surfaces would be covered by pavement, landscaping, or buildings. Therefore, erosion or loss of topsoil would not occur. **As such, the Project or the Project with the East Site Hotel Option operation would have no impact related to erosion and loss of topsoil.**

(2) Mitigation Measures

Impacts regarding substantial soil erosion or the loss of topsoil during Project construction were determined to be less than significant without mitigation and no impact would occur during Project operation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding substantial soil erosion or the loss of topsoil during Project construction were determined to be less than significant without mitigation, and no impact would occur during Project operation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

(1) Impact Analysis

(a) Construction Impacts

As discussed above in Threshold (a), the Project Site is not susceptible to liquefaction, lateral spreading, subsidence, or impacts associated with landslides. Nonetheless, it is accepted that Project excavation would cause disturbance of existing soils and could, without code compliance, contribute to potential localized raveling or caving of excavated areas (e.g. the excavated side walls loosing stability). However, all required excavations would be sloped and properly shored in accordance with the applicable provisions of the CBC incorporated into the City's Building Code to minimize the potential for site stability hazards during temporary excavation activities. Per City Building Code requirements, prior to issuance of a grading permit, a qualified geotechnical engineer must prepare and submit to the LADBS a Final Geotechnical Report that includes site-specific design recommendations for seismic safety and design requirements for foundations, retaining walls/shoring and excavation to meet applicable State and City code and regulatory requirements. As with the 2019 Geotechnical Investigation, the Final Geotechnical Report would recommend a shoring system of waterproofed restrained/braced retaining walls with subdrains or weepholes, and other suitable excavation engineering techniques.

Based on the above, development of the Project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. **Therefore, impacts associated with unstable geologic units or soils on the Project Site as a result of the Project or the Project with the East Site Hotel Option construction would be less than significant.**

(b) Operational Impacts

Once constructed, all surfaces would be covered by pavement, landscaping, or buildings. **Therefore, the Project or the Project with the East Site Hotel Option operation would have no impact related to unstable soil conditions.**

(2) Mitigation Measures

Impacts regarding unstable soils during Project construction were determined to be less than significant without mitigation, and no impact would occur during Project operation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding unstable soils during Project construction would be less than significant without mitigation, and no impact would occur during Project operation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (d): Would the Project be located on expansive soil creating substantial risks to life or property?

(1) Impact Analysis

(a) Construction Impacts

As discussed above, geotechnical testing of the soils at the Project Site indicates that the near surface soils have a low to medium potential for expansion. However, five subterranean levels would be constructed below the structures on both the West and East Sites, thus removing all shallow soils, along with the potentially expansive soils. In addition, expansive soil hazards would be further evaluated for the Project Site as part of the LADBS approved Final Geotechnical Report that would include site-specific design recommendations for addressing expansive soils, as needed. Further, compliance with standard construction and engineering practices (i.e., on-site excavation requiring suitable engineered stabilization in accordance with the CBC and proper engineering erosion control and proper engineering drainage design), addressing expansive soils and building code regulations pertinent to foundation stability would ensure that expansive soils are removed, as necessary. **Based on the above, development of the Project or the Project with the East Site Hotel Option would not be located on expansive soils creating substantial risks to life or property. Therefore, impacts regarding expansive soils would be less than significant.**

(b) Operational Impacts

Once constructed, all surfaces would be covered by pavement, landscaping, or buildings, and all shallow soils that may have been susceptible to expansion would have been removed. **Therefore, the Project or the Project with the East Site Hotel Option operation would have no impact related to expansive soil conditions.**

(2) Mitigation Measures

Impacts regarding expansive soils during Project construction would be less than significant, and no impact would occur during Project operation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding expansive soils during Project construction would be less than significant without mitigation, and no impact would occur during Project operation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

As discussed in Subsection VI.6, *Impacts Found not to be Significant*, and in the Initial Study (Appendix A) of this Draft EIR, the Project would not use septic tanks or alternative waste water disposal systems. The Project would connect to the existing sewer system. **Therefore, no impact would occur with respect to Threshold (e), and no further analysis is required.**

Threshold (f): Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

(1) Impact Analysis

Given the Project is in an urban developed location, there are no unique geologic features and unique geologic features are not discussed further. Analysis regarding the potential for unique paleontological resources are discussed further below.

A thorough background research and analysis detailed in the Paleontological Resources Assessment Report were conducted for the Project Site (refer to Appendix G-4 of this Draft EIR). Although the records search resulted in no known localities within the Project Site, a number of vertebrate fossils are known from similar sedimentary deposits in Los Angeles and in nearby areas.[73] Given the discovery of significant fossil remains as shallow as 5 to 6 feet below grade at locations near the Project Site and the results of the 2015 and 2019 Fault Studies that indicated the shallowest soils are at least 5,000 years old, sediments present across the Project Site are assigned high paleontological sensitivity as they are of an age to preserve fossils. Substantial excavation within the Project Site during

[73] McLeod, S., Re: Paleontological resources for the proposed Hollywood Center Project, in the City of Los Angeles, Los Angeles County, project area. Letter response to Vanessa Ortiz, April 26, 2018.

construction for subterranean parking, shoring, and ancillary uses, or improvements is planned at depths up to 82 feet bgs, which would access high sensitivity alluvial sediments. This classification indicates a high potential for fossils to be present in the subsurface. **As a result, Project or Project with the East Site Hotel Option construction would have the potential to directly or indirectly destroy a unique paleontological resource not identified in the analysis conducted for the Project Site and, as such, would result in a potentially significant impact.**

(2) Mitigation Measures

The following mitigation measures are proposed to address the potential impacts on paleontological resources during Project construction:

- **GEO-MM-1:** A Qualified Paleontologist meeting the SVP Standards[74] (Qualified Paleontologist) shall be retained prior to the approval of demolition or grading permits. The Qualified Paleontologist shall provide technical and compliance oversight of all work as it relates to paleontological resources, shall attend the Project kick-off meeting and Project progress meetings on a regular basis, and shall report to the Project Site in the event potential paleontological resources are encountered.

- **GEO-MM-2:** The Qualified Paleontologist shall conduct construction worker paleontological resources sensitivity training at the Project kick-off meeting prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.). In the event construction crews are phased, additional training shall be conducted for new construction personnel. The training session shall focus on the recognition of the types of paleontological resources that could be encountered within the Project Site and the procedures to be followed if they are found. Documentation shall be retained by the Qualified Paleontologist demonstrating that the appropriate construction personnel attended the training.

- **GEO-MM-3:** Paleontological resources monitoring shall be performed by a qualified paleontological monitor (meeting the standards of the SVP, 2010) under the direction of the Qualified Paleontologist. Paleontological resources monitoring shall be conducted for all ground disturbing activities in previously undisturbed sediments which have high sensitivity for encountering paleontological resources. Depending on the conditions encountered, full-time monitoring can be reduced to part-time inspections or ceased entirely if determined adequate by the Qualified Paleontologist. The Qualified Paleontologist shall spot check the excavation on an intermittent basis and recommend whether the depth of required monitoring needs to be revised based on his/her observations. Monitors shall have the authority to temporarily

74 SVP, Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources, 2010.

halt or divert work away from exposed fossils or potential fossils. Monitors shall prepare daily logs detailing the types of activities and soils observed and any discoveries. Any significant fossils collected during Project-related excavations shall be prepared to the point of identification and curated into an accredited repository with retrievable storage. The Qualified Paleontologist shall prepare a final monitoring and mitigation report for submittal to the City in order to document the results of the monitoring effort and any discoveries. If there are significant discoveries, fossil locality information and final disposition shall be included with the final report, which shall be submitted to the appropriate repository and the City.

(3) Level of Significance After Mitigation

Impacts related to paleontological resources during Project construction would be reduced to less than significant with implementation of the above mitigation measures. The Project would have no impacts to paleontological resources during operation as there would be no continuous groundbreaking and excavation activities during Project operation.

e) Cumulative Impacts

Construction activities, including excavation depths, building footprint, and construction methods, would be essentially the same under the Project or the Project with the East Site Hotel Option. Accordingly, cumulative construction impacts would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the cumulative construction impact analysis presented below are the same and also apply to the Project with the East Site Hotel Option.

Although the East Senior Building under the Project with the East Site Hotel Option would be two floors shorter than under the Project, both would similarly redevelop the Project Site. Accordingly, cumulative operational impacts would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the cumulative operational impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

(1) Impact Analysis

Due to the site-specific nature of geological conditions (i.e., soils, geological features, subsurface features, seismic features, etc.), geology impacts are typically assessed on a project-by-project basis rather than on a cumulative basis. Nonetheless, cumulative growth through 2027 (buildout year), inclusive of the 150 related projects identified in Chapter III, *Environmental Setting*, of this Draft EIR, could potentially result in impacts on geology and soils and paleontological resources. However, as with the Project, related projects would be subject to established guidelines and regulations pertaining to building design and seismic

safety, including those set forth in the CBC and the Los Angeles Building Code. **Therefore, considering the proposed land uses of the Project or the Project with the East Site Hotel Option and related projects, as well as the existing regulatory requirements and regulations that would apply to all development, the Project's or the Project with the East Site Hotel Option's contribution to cumulative impacts would not be cumulatively considerable. As such, cumulative impacts regarding geology and soils would be less than significant.**

With regard to paleontological resources, projects within the cumulative study area for the Project include construction excavation on parcels that have been disturbed or are already developed, as well as on open space parcels, and would have the potential to disturb geological units that are sensitive for paleontological resources. Generally, however, projects that require substantial excavation would be subject to environmental review under CEQA. If the potential for significant impacts on paleontological resources were identified given the site characteristics and development program of the related projects, mitigation measures, similar to the ones proposed under the Project, would be required. As with the Project, these measures would include a monitoring program and treatment/curation of discovered fossils. Implementation of these measures would reduce the potential for adverse effects on fossil resources individually and cumulatively, and would preserve and maximize the potential of these resources to contribute to the body of scientific knowledge. The related projects would be required to comply with applicable regulations and standard City mitigation measures regarding paleontological resources. **Therefore, the Project's or the Project with the East Site Hotel Option's contribution to cumulative impacts would not be cumulatively considerable. As such, cumulative impacts on paleontological resources would be less than significant.**

(2) Mitigation Measures

Cumulative impacts regarding geology and soils were determined to be less than significant without mitigation. Therefore, no additional mitigation measures beyond those identified for the reduction of impacts related to paleontological resources are required.

(3) Level of Significance After Mitigation

Cumulative impacts related to geology and soils would be less than significant without additional mitigation measures beyond those identified for the reduction of impacts related to paleontological resources.

IV. Environmental Impact Analysis

E. Greenhouse Gas Emissions

1. Introduction

This section of this Draft EIR addresses the Project's estimated greenhouse gas (GHG) emissions generated by construction and operations, inclusive of mandatory and voluntary energy and resource conservation measures that have been incorporated into the Project design. The analysis also addresses the consistency of the Project with applicable regulations, plans, and policies set forth by the State of California, South Coast Air Quality Management District (SCAQMD), Southern California Association of Governments (SCAG), and the City of Los Angeles (City) to reduce GHG emissions. The Project's potential contributions to global climate change are discussed. Details regarding the GHG analysis are provided in the Air Quality/Greenhouse Gas Emissions Technical Appendix (AQ/GHG Technical Appendix), which is attached as Appendix E of this Draft EIR.[1]

As discussed in Chapter I, *Introduction*, of this Draft EIR, and as presented in Appendix C of this Draft EIR, the Project qualifies for CEQA streamlining per Senate Bill (SB) 375 and Public Resources Code (PRC) Section 21159.28. Accordingly, no environmental analysis is required of Project-specific or cumulative impacts from cars and light-duty truck trips generated by the Project on global warming. Nonetheless, the GHG emissions from cars and light-duty truck trips have been included in the overall GHG emissions estimates, which provides a conservative analysis.

2. Environmental Setting

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation and storms. Historical records indicate that global climate changes have occurred in the past due to natural phenomena; however current data increasingly indicates that the current global conditions differ from past climate changes in rate and magnitude. Global climate change attributable to anthropogenic (human) GHG emissions is currently one of the most important and widely debated scientific, economic and political issues in the United States

[1] CO_2e emissions are calculated using the global warming potential values from the Intergovernmental Panel on Climate Change Fourth Assessment Report. Emissions differ from the analysis conducted for the Environmental Leadership Development Project (ELDP) certification for the following reasons: Project construction and operational schedule and development details were further refined after ELDP publication, on-road mobile source emissions for the Draft EIR utilize the City's VMT Calculator Tool which provides more accurate VMT estimates for locations in the City as compared to the methodology used in the ELDP analysis and the EMFAC2017 model, which was approved by the United States Environmental Protection Agency (USEPA) in 2019.

and the world. The extent to which increased concentrations of GHGs have caused or will cause climate change and the appropriate actions to limit and/or respond to climate change are the subject of significant and rapidly evolving regulatory efforts at the federal and state levels of government.

GHGs are compounds in the Earth's atmosphere which play a critical role in determining temperature near the Earth's surface. More specifically, these gases allow high-frequency shortwave solar radiation to enter the Earth's atmosphere, but retain some of the low frequency infrared energy which is radiated back from the Earth towards space, resulting in a warming of the atmosphere. Not all GHGs possess the same ability to induce climate change; as a result, GHG contributions are commonly quantified in the units of equivalent mass of carbon dioxide (CO_2e). CO_2e emissions are calculated by applying the proper global warming potential (GWP) value to pollutant specific emissions.[2] These GWP ratios are available from the Intergovernmental Panel on Climate Change (IPCC) in its Fourth Assessment Report (AR4).[3] Compounds that are regulated as GHGs are discussed below.[4,5]

Carbon Dioxide (CO_2): CO_2 is the most abundant GHG in the atmosphere, with the primary anthropogenic source being fossil fuel combustion from stationary and mobile sources. CO_2 is the reference gas (GWP of 1) for determining the GWPs of other GHGs.[6]

Methane (CH_4): CH_4 is emitted from biogenic sources (i.e., resulting from the activity of living organisms), incomplete combustion in forest fires, anaerobic decomposition of organic matter in landfills, manure management, and leaks in natural gas pipelines. The GWP of CH_4 is 21 in the IPCC SAR and 25 in the IPCC AR4.[7]

Nitrous Oxide (N_2O): N_2O produced by human-related sources including agricultural soil management, animal manure management, sewage treatment, mobile and stationary

2 GWPs and associated CO_2e values were developed by the Intergovernmental Panel on Climate Change (IPCC), and published in its Second Assessment Report (SAR) in, 1996. Historically, GHG emission inventories have been calculated using the GWPs from the IPCC's SAR. The IPCC updated the GWP values based on the latest science in its Fourth Assessment Report (AR4). The California Air Resources Board (CARB) reports GHG emission inventories for California using the GWP values from the IPCC AR4. Therefore, the analysis below reflects the GWP values from IPCC AR4. Although the IPCC has released its Fifth Assessment Report (AR5) with updated GWPs, CARB reports the Statewide GHG inventory using the AR4 GWPs, which is consistent with international reporting standards.

3 Intergovernmental Panel on Climate Change (IPCC), Fourth Assessment Report, Working Group I Report: The Physical Science Basis, 2007.

4 IPCC, Second Assessment Report, Working Group I: The Science of Climate Change, 1995.

5 IPCC, Fourth Assessment Report, Working Group I Report: The Physical Science Basis, 2007.

6 IPCC, Fourth Assessment Report, Working Group I Report: The Physical Science Basis, Table 2.14, 2007.

7 IPCC, Fourth Assessment Report, Working Group I Report: The Physical Science Basis, Table 2.14, 2007.

combustion of fossil fuel, adipic acid production, and nitric acid production. The GWP of N_2O is 310 in the IPCC SAR and 298 in the IPCC AR4.[8]

Hydrofluorocarbons (HFCs): HFCs are fluorinated compounds consisting of hydrogen, carbon, and fluorine. They are typically used as refrigerants in both stationary refrigeration and mobile air conditioning systems. The GWPs of HFCs ranges from 140 for HFC-152a to 11,700 for HFC-23 in the IPCC SAR and 124 for HFC-152a to 14,800 for HFC-23 in the IPCC AR4.[9]

Perfluorocarbons (PFCs): PFCs are fluorinated compounds consisting of carbon and fluorine. They are primarily created as a byproduct of aluminum production and semiconductor manufacturing. The GWPs of PFCs range from 6,500 to 9,200 in the IPCC SAR and 7,390 to 17,700 in the IPCC AR4.[10]

Sulfur Hexafluoride (SF_6): SF_6 is a fluorinated compound consisting of sulfur and fluoride. It is a colorless, odorless, nontoxic, nonflammable gas. It is most commonly used as an electrical insulator in high voltage equipment that transmits and distributes electricity. SF_6 has a GWP of 23,900 in the IPCC SAR and 22,800 in the IPCC AR4.[11]

a) Regulatory Framework

(1) Federal

The United States Environmental Protection Agency (USEPA) is responsible for implementing federal policy to address GHGs. The federal government administers a wide array of public-private partnerships to reduce the GHG intensity generated in the United States. These programs focus on energy efficiency, renewable energy, methane and other non-CO_2 gases, agricultural practices, and implementation of technologies to achieve GHG reductions. The USEPA implements numerous voluntary programs that contribute to the reduction of GHG emissions. These programs (e.g., the Energy Star labeling system for energy-efficient products) encourage voluntary reductions by large corporations, consumers, industrial and commercial buildings, and many major industrial sectors.

(a) Clean Air Act

In *Massachusetts v. Environmental Protection Agency* (2007) 549 U.S. 497, the United States Supreme Court held in April 2007 that the USEPA has statutory authority under Section 202 of the federal Clean Air Act (CAA) to regulate GHGs. The court did not hold

8 IPCC, Fourth Assessment Report, Working Group I Report: The Physical Science Basis, Table 2.14, 2007.
9 IPCC, Fourth Assessment Report, Working Group I Report: The Physical Science Basis, Table 2.14, 2007.
10 IPCC, Fourth Assessment Report, Working Group I Report: The Physical Science Basis, Table 2.14, 2007.
11 IPCC, Fourth Assessment Report, Working Group I Report: The Physical Science Basis, Table 2.14, 2007.

that the USEPA was required to regulate GHG emissions; however, it indicated that the agency must decide whether GHGs cause or contribute to air pollution that is reasonably anticipated to endanger public health or welfare. On December 7, 2009, the USEPA Administrator signed two distinct findings regarding GHGs under Section 202(a) of the CAA. The USEPA adopted a Final Endangerment Finding for the six defined GHGs (CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6) on December 7, 2009. The Endangerment Finding is required before USEPA can regulate GHG emissions under Section 202(a)(1) of the CAA consistently with the United States Supreme Court decision. The USEPA also adopted a Cause or Contribute Finding in which the USEPA Administrator found that GHG emissions from new motor vehicle and motor vehicle engines are contributing to air pollution, which is endangering public health and welfare. These findings do not, by themselves, impose any requirements on industry or other entities. However, these actions were a prerequisite for implementing GHG emissions standards for vehicles.

(b) Energy Independence and Security Act

The Energy Independence and Security Act of 2007 (EISA) facilitates the reduction of national GHG emissions by requiring the following:

- Increasing the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) that requires fuel producers to use at least 36 billion gallons of biofuel in 2022;
- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances;
- Requiring approximately 25 percent greater efficiency for light bulbs by phasing out incandescent light bulbs between 2012 and 2014; requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020; and
- While superseded by the USEPA and NHTSA actions described above, (i) establishing miles per gallon targets for cars and light trucks and (ii) directing the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of green jobs.[12]

(c) Executive Order 13432

In response to the *Massachusetts v. Environmental Protection Agency* ruling, President Bush signed Executive Order 13432 on May 14, 2007, directing the USEPA, along with the Departments of Transportation, Energy, and Agriculture, to initiate a regulatory

12 A green job, as defined by the United States Department of Labor, is a job in business that produces goods or provides services that benefit the environment or conserve natural resources.

process that responds to the Supreme Court's decision. Executive Order 13432 was codified into law by the 2009 Omnibus Appropriations Law signed on February 17, 2009. The order sets goals in the areas of energy efficiency, acquisition, renewable energy, toxics reductions, recycling, sustainable buildings, electronics stewardship, fleets, and water conservation.

(d) Light-Duty Vehicle Greenhouse Gas and Corporate Average Fuel Economy Standards.

On May 19, 2009, President Obama announced a national policy for fuel efficiency and emissions standards in the United States auto industry. The adopted federal standard applied to passenger cars and light-duty trucks for model years 2012 through 2016. The rule surpassed the prior Corporate Average Fuel Economy (CAFE)[13] standards and required an average fuel economy standard of 35.5 miles per gallon (mpg) and 250 grams of CO_2 per mile by model year 2016, based on USEPA calculation methods. These standards were formally adopted on April 1, 2010. In August 2012, standards were adopted for model year 2017 through 2025 passenger cars and light-duty trucks. By 2020, new vehicles are projected to achieve 41.7 mpg (if GHG reductions are achieved exclusively through fuel economy improvements) and 213 grams of CO_2 per mile (Phase II standards). By 2025, new vehicles are projected to achieve 54.5 mpg (if GHG reductions are achieved exclusively through fuel economy improvements) and 163 grams of CO_2 per mile. According to the USEPA, under these standards a model year 2025 vehicle would emit one-half of the GHG emissions compared to a model year 2010 vehicle.[14] In 2017, the USEPA recommended no change to the GHG standards for light-duty vehicles for model years 2022–2025.

In August 2018, the USEPA and NHTSA proposed the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule that would, if adopted, maintain the CAFE and CO_2 standards applicable in model year 2020 for model years 2021 through 2026. The estimated CAFE and CO_2 standards for model year 2020 are 43.7 mpg and 204 grams of CO_2 per mile for passenger cars and 31.3 mpg and 284 grams of CO_2 per mile for light trucks, projecting an overall industry average of 37 mpg, as compared to 46.7 mpg under the standards issued in 2012. In September 2019, the USEPA published the final rule in the Federal Register.[15] The USEPA also published the final rule for the One National Program on Federal Preemption of State Fuel Economy Standards that finalizes critical parts of the SAFE Vehicles Rule and makes clear that federal law preempts state and local tailpipe GHG emissions standards as well as zero emission vehicle (ZEV) mandates. In November 2019, California and 23 other states, environmental groups, and the cities of Los Angeles and New York, filed a petition with the U.S. Court of Appeals for the District

13 The Corporate Average Fuel Economy standards are regulations in the United States, first enacted by Congress in 1975, to improve the average fuel economy of cars and light trucks. The U.S Department of Transportation has delegated the National Highway Traffic Safety Administration as the regulatory agency for the Corporate Average Fuel Economy standards.

14 United States Environmental Protection Agency (USEPA), EPA and NHTSA Set Standards to Reduce Greenhouse Gases and Improve Fuel Economy for Model Years 2017-2025 Cars and Light Trucks, August 2012.

15 Federal Register, Vol. 84, No. 188, Friday, September 27, 2019, Rules and Regulations, 51310-51363.

of Columbia Circuit, for the EPA to reconsider the published rule. The Court has not yet ruled on the lawsuit.

(2) State

California has promulgated a series of executive orders, laws, and regulations aimed at reducing both the level of GHGs in the atmosphere and emissions of GHGs from commercial and private activities within the State.

(a) California Greenhouse Gas Reduction Targets

(i) Assembly Bill 32 (California Global Warming Solutions Act of 2006) and Senate Bill 32 (Emissions Limit)

In 2006, the California State Legislature adopted Assembly Bill (AB) 32 (codified in the California Health and Safety Code [HSC], Division 25.5 – California Global Warming Solutions Act of 2006), which focuses on reducing GHG emissions in California to 1990 levels by 2020. AB 32 defines GHGs as CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6 and represents the first enforceable Statewide program to limit emissions of these GHGs from all major industries with penalties for noncompliance. The law further requires that reduction measures be technologically feasible and cost effective. Under AB 32, the California Air Resources Board (CARB) has the primary responsibility for reducing GHG emissions. AB 32 required CARB to adopt rules and regulations directing State actions that would achieve GHG emissions reductions equivalent to 1990 Statewide levels by 2020.

In 2016, the California State Legislature adopted Senate Bill (SB) 32 and its companion bill AB 197, and both were signed by Governor Brown to update AB 32 and include an emissions reductions goal for the year 2030. SB 32 and AB 197 amend AB 32, and establish a new climate pollution reduction target of 40 percent below 1990 levels by 2030, and include provisions to ensure the benefits of State climate policies reach into disadvantaged communities.

(a) Climate Change Scoping Plan (2008)

A specific requirement of AB 32 was to prepare a Climate Change Scoping Plan for achieving the maximum technologically feasible and cost-effective GHG emission reduction by 2020 (Health and Safety Code Section 38561 (h)). CARB developed an AB 32 Climate Change Scoping Plan (2008 Scoping Plan) that contained strategies to achieve the 2020 emissions cap.[16] The 2008 Scoping Plan was approved in 2008, and contains a mix of recommended strategies that combined direct regulations, market-based approaches, voluntary measures, policies, and other emission reduction programs calculated to meet the 2020 Statewide GHG emission limit and initiate the transformations needed to achieve the State's long-range climate objectives.[17]

16 California Air Resources Board (CARB), Climate Change Scoping Plan, December 2008.
17 CARB, Climate Change Scoping Plan Document, December 2008.

As required by AB 32, CARB approved the 1990 GHG emissions inventory, thereby establishing the emissions limit for 2020. The 2020 emissions limit was originally set at 427 $MMTCO_2e$ using the GWP values from the IPCC SAR. CARB also projected the State's 2020 GHG emissions under No-Action-Taken (NAT) conditions – that is, emissions that would occur without any plans, policies, or regulations to reduce GHG emissions. CARB originally used an average of the State's GHG emissions from 2002 through 2004 and projected the 2020 levels at approximately 596 $MMTCO_2e$ (using GWP values from the IPCC SAR). Therefore, under the original projections, the State must reduce its 2020 NAT emissions by 28.4 percent in order to meet the 1990 target of 427 $MMTCO_2e$.

(b) First Update to the Climate Change Scoping Plan (2014)

The First Update to the Climate Change Scoping Plan (2014 Scoping Plan) was approved by CARB in May 2014 and built upon the 2008 Scoping Plan with new strategies and recommendations.[18] In 2014, CARB revised the target using the GWP values from the IPCC AR4 and determined that the 1990 GHG emissions inventory and 2020 GHG emissions limit is 431 $MMTCO_2e$. CARB also updated the State's 2020 NAT emissions estimate to account for the effect of the 2007–2009 economic recession, new estimates for future fuel and energy demand, and the reductions required by regulation that were adopted for motor vehicles and renewable energy. CARB's projected Statewide 2020 emissions estimate using the GWP values from the IPCC AR4 is 509.4 $MMTCO_2e$.

Therefore, under the 2014 Scoping Plan, the emission reductions necessary to achieve the 2020 emissions target of 431 $MMTCO_2e$ would be 78.4 $MMTCO_2e$, or a reduction of GHG emissions by approximately 15.4 percent.

(c) 2017 Climate Change Scoping Plan

In response to the 2030 GHG reduction target, CARB adopted the 2017 Climate Change Scoping Plan (2017 Scoping Plan) at a public meeting held in December 2017.[19] The 2017 Scoping Plan outlines the strategies the State will implement to achieve the 2030 GHG reduction target, which build on the Cap-and-Trade Regulation,[20] the LCFS,[21] improved vehicle, truck and freight movement emissions standards, increasing renewable energy, and strategies to reduce methane emissions from agricultural and other wastes by using it to meet California's energy needs. CARB's projected Statewide 2030 emissions take into account 2020 GHG reduction policies and programs. The 2017 Scoping Plan also comprehensively addresses GHG emissions from natural and working lands of California, including the agriculture and forestry sectors. The adopted 2017 Scoping Plan includes ongoing and statutorily required programs and continuing

18 CARB, First Update to the AB 32 Scoping Plan, May 2014.

19 CARB, California's 2017 Climate Change Scoping Plan, November 2017.

20 Refer Subsection IV.E.2.a)(2)(h), *Jobs and Economic Improvement Through Environmental Leadership Act*, for a detailed description of the Cap-and-Trade Program.

21 Refer to Subsection IV.E.2.a)(2)(e), *Senate Bill 97 (SB 97, Dutton) (Chapter 185, Statutes of 2007)*, for a detailed discussion of the LCFS.

the Cap-and-Trade Program. This Scoping Plan Scenario was modified from the January 2017 Proposed Scoping Plan to reflect AB 398,[22] including removal of the 20 percent refinery measure.

CARB states that the Scoping Plan Scenario "is the best choice to achieve the State's climate and clean air goals."[23] Under the Scoping Plan Scenario, the majority of the reductions would result from the continuation of the Cap-and-Trade regulation. Additional reductions are achieved from electricity sector standards (i.e., utility providers to supply at least 50 percent renewable electricity by 2030), doubling the energy efficiency savings at end uses, additional reductions from the LCFS, implementing the short-lived GHG strategy (e.g., hydrofluorocarbons), and implementing the mobile source strategy and sustainable freight action plan. The alternatives were designed to consider various combinations of these programs, as well as consideration of a carbon tax in the event the Cap-and-Trade regulation is not continued. However, in July 2017, the California Legislature voted to extend the Cap-and-Trade regulation to 2030.

The 2017 Scoping Plan discusses the role of local governments in meeting the State's GHG reductions goals because local governments have jurisdiction and land use authority related to: community-scale planning and permitting processes, local codes and actions, outreach and education programs, and municipal operations.[24] Furthermore, local governments may have the ability to incentivize renewable energy, energy efficiency, and water efficiency measures.[25]

A summary of the GHG emissions reductions required under AB 32 is provided in **Table IV.E-1**, *Estimated Greenhouse Gas Emissions Reductions Required by AB 32 and SB 32*.

Under the Scoping Plan Scenario, continuation of the Cap-and-Trade regulation (or carbon tax) is expected to cover approximately 34 to 79 $MMTCO_2$ of the 2030 reduction obligation.[26] The short-lived GHG strategy is expected to cover approximately 17 to 35 $MMTCO_2e$. The Renewables Portfolio Standard with 50 percent renewable electricity by 2030 is expected to cover approximately 3 $MMTCO_2$. The mobile source strategy and sustainable freight action plan includes maintaining the existing vehicle GHG emissions standards, increasing the number of zero emission vehicles, and improving the freight system efficiency, and is expected to cover approximately 11 to 13 $MMTCO_2$. Under the Scoping Plan Scenario, CARB expects that the doubling of the energy efficiency savings by 2030 would cover approximately 7 to 9 $MMTCO_2$ of the 2030 reduction obligation. The other strategies would be expected to cover the remaining 2030 reduction obligations.

22 AB 398 was enacted in 2017 to extend and clarify the role of the State's Cap-and-Trade Program through December 31, 2030. As part of AB 398, refinements were made to the Cap-and-Trade program to establish updated protocols and allocation of proceeds to reduce GHG emissions.
23 CARB, California's 2017 Climate Change Scoping Plan, November 2017.
24 CARB, California's 2017 Climate Change Scoping Plan, November 2017, p. 97.
25 CARB, California's 2017 Climate Change Scoping Plan, November 2017, p. 97.
26 CARB, California's 2017 Climate Change Scoping Plan, November 2017, Appendix G.

TABLE IV.E-1
ESTIMATED GREENHOUSE GAS EMISSIONS REDUCTIONS REQUIRED BY AB 32 AND SB 32

Emissions Scenario	GHG Emissions ($MMTCO_2e$)
2008 Scoping Plan (IPCC SAR)	
2020 NAT Forecast (CARB 2008 Scoping Plan Estimate)	596
2020 Emissions Target Set by AB 32 (i.e., 1990 level)	427
Reduction below NAT necessary to achieve 1990 levels by 2020	169 (28.4%) [a]
2014 Scoping Plan (GHG Estimates Updated in 2014 to Reflect IPCC AR4)	
2020 NAT Forecast (CARB 2014 Scoping Plan Estimate)	509.4
2020 Emissions Target Set by AB 32 (i.e., 1990 level)	431
Reduction below NAT necessary to achieve 1990 levels by 2020	78.4 (15.4%) [b]
2017 Scoping Plan Update	
2030 NAT Forecast ("Reference Scenario" which includes 2020 GHG reduction policies and programs)	389
2030 Emissions Target Set by AB 32 (i.e., 40% below 1990 Level)	260
Reduction below NAT Necessary to Achieve 40% below 1990 Level by 2030	129 (33.2%) [c]

$MMTCO_2e$ = million metric tons of carbon dioxide equivalents

[a] 596 – 427 = 169 / 596 = 28.4%

[b] 509.4 – 431 = 78.4 / 509.4 = 15.4%

[c] 389 – 260 = 129 / 389 = 33.2%

SOURCES: CARB, Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED), Attachment D, August 19, 2011; CARB, GHG 2020 Business-as-Usual (BAU) Emissions Projection, 2014 Edition, 2017, https://ww2.arb.ca.gov/ghg-bau, accessed February 27, 2020; CARB, California's 2017 Climate Change Scoping Plan, November 2017.

(ii) Executive Order S-3-05

Governor Schwarzenegger announced on June 1, 2005, through Executive Order S-3-05,[27] the following GHG emission reduction targets:

- By 2010, California shall reduce GHG emissions to 2000 levels;
- By 2020, California shall reduce GHG emissions to 1990 levels; [28] and
- By 2050, California shall reduce GHG emissions to 80 percent below 1990 levels.

27 Center for Climate Strategies, Executive Order S-3-05.

28 CARB, Climate Pollutants Fall Below 1990 Levels for First Time, https://ww2.arb.ca.gov/news/climate-pollutants-fall-below-1990-levels-first-time, accessed February 27, 2020.

In accordance with Executive Order S-3-05, the Secretary of California Environmental Protection Agency (CalEPA) is required to coordinate efforts of various agencies, which comprise the California Climate Action Team (CAT), in order to collectively and efficiently reduce GHGs. These agencies include CARB, the Secretary of the Business, Transportation and Housing Agency, Department of Food and Agriculture, the Resources Agency, the California Energy Commission, and the Public Utilities Commission. The CAT provides periodic reports to the Governor and Legislature on the State of GHG reductions in the State as well as strategies for mitigating and adapting to climate change. The first CAT Report to the Governor and the Legislature, in 2006, contained recommendations and strategies to help meet the targets in Executive Order S-3-05. The 2010 CAT Report, finalized in December 2010, expands on the policies in the 2006 assessment.[29]

(iii) Executive Order B-30-15

On April 29, 2015, Governor Brown issued Executive Order B-30-15, which involved the following:

- Established a new interim Statewide reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030.
- Ordered all State agencies with jurisdiction over sources of GHG emissions to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 reduction targets.
- Directed CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent.

(iv) Executive Order B-55-18

Executive Order B-55-18 was signed by Governor Brown on September 10, 2018. The order establishes an additional Statewide policy to achieve carbon neutrality by 2045 and maintain net negative emissions thereafter. As per Executive Order B-55-18, CARB is directed to work with relevant State agencies to develop a framework for implementation and accounting that tracks progress toward this goal and to ensure future Climate Change Scoping Plans identify and recommend measures to achieve the carbon neutrality goal.

(b) Land Use and Transportation Planning

SB 375 (Chapter 728, Statutes of 2008), which establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG, was adopted by the State on September 30, 2008. Under SB 375, CARB is required, in consultation with the State's Metropolitan Planning Organizations, to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035. In February 2011, CARB adopted the GHG emissions reduction targets of 8 percent by 2020 and 13 percent by 2035 relative to 2005 GHG emissions for SCAG, which is the Metropolitan Planning

29 California Environmental Protection Agency (CalEPA), Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, 2010.

Organization for the region in which the City is located.[30] Of note, the proposed reduction targets explicitly exclude emission reductions expected from the AB 1493 and the LCFS regulations.

Under SB 375, the reduction target must be incorporated within that region's Regional Transportation Plan (RTP), which is used for long-term transportation planning, in a Sustainable Communities Strategy (SCS). Certain transportation planning and programming activities would then need to be consistent with the SCS; however, SB 375 expressly provides that the SCS does not regulate the use of land, and further provides that local land use plans and policies (e.g., general plan) are not required to be consistent with either the RTP or SCS.

In addition, on April 7, 2016, SCAG adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS), which is an update to the previous 2012-2035 RTP/SCS. Using growth forecasts and economic trends, the 2016-2040 RTP/SCS provides a vision for transportation throughout the region for the next 25 years. The 2016-2040 RTP/SCS successfully achieves and exceeds the GHG emission-reduction targets set by CARB.

In March 2018, the CARB updated the SB 375 targets to require 8 percent reduction by 2020 and a 19 percent reduction by 2035 in per capita passenger vehicle GHG emissions.[31] As this reduction target was updated after adoption of the 2016-2040 RTP/SCS, it is expected that the next iteration of the RTP/SCS will be updated to include this target.

(c) Transportation Fuel

In response to the transportation sector accounting for a large percentage of California's CO_2 emissions, AB 1493 (HSC Section 42823 and 43018.5) (also referred to as the Pavley standards), enacted on July 22, 2002, required CARB to set GHG emission standards for passenger vehicles, light duty trucks, and other vehicles whose primary use is non-commercial personal transportation manufactured in and after 2009. In setting these standards, CARB must consider cost effectiveness, technological feasibility, economic impacts, and provide maximum flexibility to manufacturers. The federal CAA ordinarily preempts state regulation of motor vehicle emission standards; however, California is allowed to set its own standards with a federal CAA waiver from the USEPA. In June 2009, the USEPA granted California the waiver.

However, as discussed previously, the USEPA and United States Department of Transportation (USDOT) adopted federal standards for model year 2012 through 2016 light-duty vehicles, which corresponds to the vehicle model years regulated under the State's Pavley Phase I standards. In August 2012, the USEPA and USDOT adopted GHG emission standards for model year 2017 through 2025 vehicles; however, these

30 SCAG, Greenhouse Gases, http://www.scag.ca.gov/programs/Pages/GreenhouseGases.aspx, accessed February 27, 2020.

31 CARB, SB 375 Regional Greenhouse Gas Emissions Reduction Targets.

standards were rescinded and replaced under the SAFE Vehicles Rule as discussed above in Subsection IV.E.2(1), *Regulatory Framework – Federal*. Prior to the SAFE Vehicles Rule, the standards corresponded to the vehicle model years regulated under the State's Pavley Phase II standards but differed slightly from the State's model year 2017 through 2025 standards. The State of California agreed not to contest the standards adopted in 2012, in part, due to the fact that while the national standard would achieve slightly less reductions in California, it would achieve greater reductions nationally and is stringent enough to meet State GHG emission reduction goals. In 2012, CARB adopted regulations that allow manufacturers to comply with the prior 2017 through 2025 national standards to meet State law (i.e., the State's Pavley Phase II standards still apply by law; however, meeting the national standards for model year 2017 through 2025 also meets State law). As mentioned above in Subsection IV.E.2(1), *Federal,* in response to the SAFE Vehicles Rules and the One National Program on Federal Preemption of State Fuel Economy Standards, in November 2019 California and 23 other states, environmental groups, and the cities of Los Angeles and New York, filed a petition with the U.S. Court of Appeals for the District of Columbia Circuit, for the EPA to reconsider the published rule. The Court has not yet ruled on the lawsuit.

In January 2007, Governor Brown enacted Executive Order S-01-07, which mandates the following: (1) establish a Statewide goal to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020; and (2) adopt an LCFS for transportation fuels in California. CARB identified the LCFS as one of the nine discrete early actions in the Climate Change Scoping Plan. The LCFS regulations were approved by CARB in 2009 and established a reduction in the carbon intensity of transportation fuels by 10 percent by 2020 with implementation beginning on January 1, 2011. In September 2015, CARB approved the re-adoption of the LCFS, which became effective on January 1, 2016, to address procedural deficiencies in the way the original regulation was adopted. In April 2017, the LCFS was brought before the Court of Appeal challenging the analysis of potential nitrogen dioxide impacts from biodiesel fuels. The Court directed CARB to conduct an analysis of nitrogen dioxide impacts from biodiesel fuels and froze the carbon intensity targets for diesel and biodiesel fuel provisions at 2017 levels until CARB has completed this analysis. On March 6, 2018 CARB issued its Draft Supplemental Disclosure Discussion of Oxides of Nitrogen Potentially Caused by the Low Carbon Fuel Standard Regulation.[32] CARB posted modifications to the amendments on August 13, 2018, with a public comment period through August 30, 2018. Final approval of regulatory changes from CARB's analysis of nitrogen dioxide impacts from biodiesel fuels was made on January 4, 2019.[33] The 2017 Climate Change Scoping Plan also calls for increasing the mandatory reduction in carbon intensity of transportation fuels from 10 percent to 18 percent by 2030.

32 CARB, Low Carbon Fuel Standard and Alternative Diesel Fuels Regulation.
33 CARB, Low Carbon Fuel Standard and Alternative Diesel Fuels Regulation.

(d) Energy

The California Energy Commission (CEC) first adopted Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR, Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the State. Although not originally intended to reduce GHG emissions, increased energy efficiency and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standard. The standards are updated periodically (typically every three years) to allow for the consideration and inclusion of new energy efficiency technologies and methods. The Energy Efficiency Standards for Residential and Nonresidential Buildings focuses on several key areas to improve the energy efficiency of renovations and addition to existing buildings as well as newly constructed buildings and renovations and additions to existing buildings. The major efficiency improvements to the residential Standards involve improvements for attics, walls, water heating, and lighting, whereas the major efficiency improvements to the nonresidential Standards include alignment with the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) 90.1-2013 national standards. Furthermore, the standards require that enforcement agencies determine compliance with CCR, Title 24, Part 6 before issuing building permits for any construction.[34]

Part 11 of the Title 24 Building Energy Efficiency Standards is referred to as the California Green Building Standards (CALGreen) Code. The purpose of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality."[35] The CALGreen Code is not intended to substitute for or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission. The CALGreen Code establishes mandatory measures for new residential and non-residential buildings. Such mandatory measures include energy efficiency, water conservation, material conservation, planning and design and overall environmental quality.[36]

The State has adopted regulations to increase the proportion of electricity from renewable sources. In November 2008, Governor Schwarzenegger signed Executive Order S-14-08,[37] which expands the State's Renewables Portfolio Standard to 33 percent renewable power by 2020. On April 12, 2011, Governor Jerry Brown signed SB X1-2 to increase California's Renewables Portfolio Standard to 33 percent by 2020. SB 350 (Chapter 547,

34 California Energy Commission (CEC), 2016 Building Energy Efficiency Standards, June 2015, https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2016-building-energy-efficiency, accessed February 27, 2020.

35 California Building Standards Commission, 2010 California Green Building Standards Code, 2010.

36 California Building Standards Commission, 2010 California Green Building Standards Code, 2010.

37 Center for Climate Strategies, Executive Order S-14-08.

Statues of 2015) further increased the Renewables Portfolio Standard to 50 percent by 2030. The legislation also included interim targets of 40 percent by 2024 and 45 percent by 2027. On September 10, 2018, Governor Jerry Brown signed SB 100, which further increased California's Renewables Portfolio Standard to achieve 50 percent renewable resources by December 31, 2026, and a 60 percent target by December 31, 2030, while requiring retail sellers and local publicly owned electric utilities to procure eligible renewable electricity for 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030, and that CARB should plan for 100 percent eligible renewable energy resources and zero-carbon resources by December 31, 2045.

(e) Senate Bill 97 (SB 97, Dutton) (Chapter 185, Statutes of 2007)

SB 97 (Chapter 185, Statutes of 2007), enacted in 2007, directed the State Office of Planning and Research (OPR) to develop California Environmental Quality Act (CEQA) Guidelines (CEQA Guidelines) "for the mitigation of GHG emissions or the effects of GHG emissions." In December 2009, OPR adopted amendments to the CEQA Guidelines, (Guidelines Amendments), Appendix G, Environmental Checklist, which created a new resource section for GHG emissions and indicated criteria that may be used to establish significance of GHG emissions.[38]

However, neither a threshold of significance nor any specific mitigation measures are included or provided in the Guidelines Amendments. The Guidelines Amendments require a lead agency to make a good-faith effort, based on scientific and factual data to the extent possible, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. The Guidelines Amendments give discretion to the lead agency, and allow the lead agency to choose whether to: (1) quantify GHG emissions resulting from a project; and/or (2) rely on a qualitative analysis or performance-based standards. Furthermore, the Guidelines Amendments identify three factors that should be considered in the evaluation of the significance of GHG emissions:

1. The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
3. The extent to which the project complies with regulations or requirements adopted to implement a Statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

38 California Code of Regulations (CCR), Title 14, Section 15064.4.

The administrative record for the Guidelines Amendments also clarifies "that the effects of greenhouse gas emissions are cumulative, and should be analyzed in the context of California Environmental Quality Act's requirements for cumulative impact analysis."[39]

(f) Cap-and-Trade Program

The Climate Change Scoping Plan identifies a Cap-and-Trade Program as a key strategy CARB will employ to help California meet its GHG reduction targets for 2020 and 2030, and ultimately achieve an 80 percent reduction from 1990 levels by 2050. Pursuant to its authority under AB 32, CARB has designed and adopted a California Cap-and-Trade Program to reduce GHG emissions from major sources (deemed "covered entities") by setting a firm cap on Statewide GHG emissions and employing market mechanisms to achieve AB 32's emission-reduction mandate of returning to 1990 levels of emissions by 2020.[40] Under the Cap-and-Trade Program, an overall limit is established for GHG emissions from capped sectors (e.g., electricity generation, petroleum refining, cement production, and large industrial facilities that emit more than 25,000 metric tons CO_2e per year) and declines over time, and facilities subject to the cap may trade permits to emit GHGs. The Statewide cap for GHG emissions from the capped sectors commenced in 2013 and declines over time, achieving GHG emission reductions throughout the Program's duration.[41] On July 17, 2017 the California legislature passed Assembly Bill 398, extending the Cap-and-Trade Program through 2030.

The Cap-and-Trade Program provides a firm cap, ensuring that the 2020 Statewide emission limit will not be exceeded. An inherent feature of the Cap-and-Trade Program is that it does not guarantee GHG emissions reductions in any discrete location or by any particular source. Rather, GHG emissions reductions are only guaranteed on an accumulative basis. In other words, as climate change is a global occurrence and the effects of GHG emissions are considered cumulative in nature, a focus on aggregate GHG emissions reductions, rather than source-specific reductions, is warranted.

If California's direct regulatory measures reduce GHG emissions more than expected, then the Cap-and-Trade Program will be responsible for relatively fewer emissions reductions. If California's direct regulatory measures reduce GHG emissions less than expected, then the Cap-and-Trade Program will be responsible for relatively more emissions reductions. In sum, the Cap-and-Trade Program will achieve aggregate, rather than site-specific or project-level, GHG emissions reductions. Also, due to the regulatory framework adopted by CARB, the reductions attributed to the Cap-and-Trade Program can change over time depending on the State's emissions forecasts and the effectiveness of direct regulatory measures.

39 Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, Secretary for Natural Resources, dated April 13, 2009.

40 17 California Code of Regulations (CCR) Sections 95800 to 96023.

41 See generally 17 CCR Sections 95811, 95812.

(g) California Air Resources Board

CARB, a part of the CalEPA, is responsible for the coordination and administration of both federal and State air pollution control programs within California. Some of the regulations and measures that CARB has adopted to reduce particulate matter, nitrogen oxides, and other emissions have co-benefits of reducing GHG emissions. Regulations and measures include:

- In 2004, CARB adopted an Airborne Toxic Control Measure (ACTM) to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other toxic air contaminants (Title 13 California Code of Regulations [CCR], Section 2485). This measure generally does not allow diesel-fueled commercial vehicles to idle for more than five (5) minutes at any given location with certain exemptions for equipment in which idling is a necessary function such as concrete trucks.
- In 2008, CARB approved the Truck and Bus regulation to reduce particulate matter and nitrogen oxide emissions from existing diesel vehicles operating in California (13 CCR, Section 2025, subsection (h)).
- In 2007, CARB promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower such as bulldozers, loaders, backhoes and forklifts, as well as many other self-propelled off-road diesel vehicles. The regulation aims to reduce emissions by installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission controlled models.

While these regulations primarily target reductions in criteria air pollutant emission, they have co-benefits of minimizing GHG emissions due to improved engine efficiencies and reduction of idling times.

(h) Jobs and Economic Improvement Through Environmental Leadership Act

Although not specifically required under CEQA, the Project would voluntarily meet the requirements of the Jobs and Economic Improvement Through Environmental Leadership Act (AB 900 and subsequent legislation), which would allow the Project to qualify for streamlined environmental review under CEQA and requires that, among other things, the Project upon completion, qualify for LEED Gold Certification, be located on an infill site, and not result in any net additional GHG emissions as determined by the Executive Director of CARB. As discussed previously, the Project would qualify for LEED Gold Certification and be located on an infill site. With respect to GHG emissions, the Project would not result in any net additional GHGs including GHG emissions from employee transportation. The Governor certified the Project as an Environmental Leadership Development Project (ELDP) under the Jobs and Economic Improvement Through Environmental Leadership Act on April 27, 2018. The Environmental Leadership Development Project certification and other related documentation are provided in Appendix B.

(i) Center for Biological Diversity v. California Department of Fish and Wildlife

The California Supreme Court considered the CEQA issue of determining the significance of GHG emissions in its decision, *Center for Biological Diversity v. California Department of Fish and Wildlife and Newhall Land and Farming* (2015) 62 Cal.4th 204. The Court questioned a then-common CEQA approach to GHG analyses for development projects that compared project emissions to the reductions from NAT that will be needed Statewide to reduce emissions to 1990 levels by 2020, as required by AB 32. The Court upheld the NAT method as a valid approach, but concluded that the NAT method was improperly applied in the case of the Newhall project because the target for the project was incorrectly deemed consistent with the Statewide emission target of a percent below NAT for the year 2020 as specified in the AB 32 Scoping Plan. In other words, the Court said that the percent below NAT target specified in the AB 32 Scoping Plan is intended as a measure of the GHG reduction effort required by the State as a whole, and it cannot necessarily be applied to the impacts of a specific project in a specific location, particularly where the record did not show that the Newhall project had been assumed or considered in the AB 32 Scoping Plan.

The Court provided some guidance to evaluating the cumulative significance of a proposed land use project's GHG emissions, but noted that none of the approaches could be guaranteed to satisfy CEQA for a particular project. The Court did not require that projects must rely on the Court's guidance in an analysis. However, this Draft EIR considers the potential GHG emissions associated with the Project within the context of the Court's guidance.

The Court also addressed project-level GHG emission inventories in the context of Statewide GHG emission inventories and reduction goals. If a project-level inventory were to include additional upstream embedded emissions associated with consumption of goods and services, or downstream transportation emissions, outside of the State, it would no longer be comparable to the State inventory and a threshold based on State reduction targets could not be used to evaluate the project's GHG emissions. Given the California Supreme Court's determination that it is appropriate under CEQA to compare project GHG emissions to a threshold related to the State reduction goals, there is no logical rationale to include GHG emissions in a CEQA project inventory if they are not included in the State's GHG inventory, nor to use methodologies to account for emissions different from those employed in the State's GHG inventory."[42] Thus, consistent with the Court's ruling, a project-level GHG emissions inventory under CEQA need not include additional upstream embedded emissions or downstream emissions to maintain consistency with the Statewide GHG emission inventory methodology.

42 Association of Environmental Professionals, Draft AEP White Paper - Production, Consumption and Lifecycle Greenhouse Gas Inventories: Implications for CEQA and Climate Action Plans, 2017, pg.1-7.

(3) Regional

(a) South Coast Air Quality Management District

The Project Site is located in the South Coast Air Basin (Air Basin), which consists of Orange County, Los Angeles County (excluding the Antelope Valley portion), and the western, non-desert portions of San Bernardino and Riverside Counties, in addition to the San Gorgonio Pass area in Riverside County. The SCAQMD is responsible for air quality planning in the Air Basin and developing rules and regulations to bring the area into attainment of the ambient air quality standards.

The SCAQMD adopted a "Policy on Global Warming and Stratospheric Ozone Depletion" on April 6, 1990. The policy commits the SCAQMD to consider global impacts in rulemaking and in drafting revisions to the Air Quality Management Plan. In March 1992, the SCAQMD Governing Board reaffirmed this policy and adopted amendments to the policy to include the following directives:[43]

- Phase out the use and corresponding emissions of chlorofluorocarbons, methyl chloroform (1,1,1-trichloroethane or TCA), carbon tetrachloride, and halons by December 1995;
- Phase out the large quantity use and corresponding emissions of hydrochlorofluorocarbons by the year 2000;
- Develop recycling regulations for hydrochlorofluorocarbons (e.g., SCAQMD Rules 1411 and 1415);
- Develop an emissions inventory and control strategy for methyl bromide; and
- Support the adoption of a California GHG emission reduction goal.

A GHG Significance Threshold Working Group was formed to further evaluate potential GHG significance thresholds.[44] In 2008, the Working Group released draft guidance regarding interim CEQA GHG significance thresholds.[45,46,47] Within its October 2008 document, the Working Group proposed the use of a percent emission reduction target compared to business as usual to determine significance for commercial/residential

43 South Coast Air Quality Management District (SCAQMD), CEQA Air Quality Handbook, April 1993, p. 3-7.

44 SCAQMD, Greenhouse Gases CEQA Significance Thresholds, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds, accessed February 27, 2020.

45 SCAQMD, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, Attachment E, October 2008.

46 SCAQMD, Board Meeting, December 5, 2008, Agenda No. 31, http://www3.aqmd.gov/hb/2008/December/0812ag.html, accessed February 27, 2020.

47 SCAQMD, Greenhouse Gases, CEQA Significance Thresholds, Board Letter – Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans, December 5, 2008. The performance standards primarily focus on energy efficiency measures beyond Title 24 and a screening level of 3,000 $MTCO_2e$ per year for residential and commercial sector projects. The SCAQMD adopted a GHG significance threshold of 10,000 $MTCO_2e$ per year for industrial stationary source projects for which the SCAQMD is the lead agency.

projects that emit greater than 3,000 $MTCO_2e$ per year. Under this proposal, commercial/residential projects that emit fewer than 3,000 $MTCO_2e$ per year would be assumed to have a less-than-significant impact on climate change. In addition, on December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold of 10,000 $MTCO_2e$ for stationary source/industrial projects where the SCAQMD is the Lead Agency. However, the SCAQMD has not adopted a GHG significance threshold for land use development projects (e.g., mixed-use/commercial projects). The aforementioned Working Group has been inactive since 2011 and the SCAQMD has not formally adopted any GHG significance threshold for land use development projects.

(b) Southern California Association of Governments

On April 7, 2016, SCAG adopted the 2016-2040 RTP/SCS, which is an update to the previous 2012-2035 RTP/SCS.[48] Using growth forecasts and economic trends, the 2016-2040 RTP/SCS provides a vision for transportation throughout the region for the next 25 years. It considers the role of transportation in the broader context of economic, environmental, and quality-of-life goals for the future, identifying regional transportation strategies to address mobility needs. The 2016-2040 RTP/SCS describes how the region can attain the GHG emission-reduction targets set by CARB by achieving an 8 percent reduction in per capita transportation GHG emissions by 2020, 18 percent reduction in per capita transportation GHG emissions by 2035, and 21 percent reduction in per capita transportation emissions by 2040 compared to the 2005 level on a per capita basis.[49] Compliance with and implementation of 2016-2040 RTP/SCS policies and strategies would have co-benefits of reducing per capita criteria air pollutant emissions (e.g. nitrogen dioxide, carbon monoxide, etc.) associated with reduced per capita vehicle miles traveled (VMT).

The 2016-2040 RTP/SCS states that the SCAG region was home to approximately 18.3 million people in 2012 and included approximately 5.9 million homes and 7.4 million jobs. By 2040, the integrated growth forecast projects that these figures will increase by 3.8 million people, with nearly 1.5 million more homes and 2.4 million more jobs. High Quality Transit Areas (HQTAs), which are defined by the 2016-2040 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours, will account for 3 percent of regional total land, but are projected to accommodate 46 percent and 55 percent of future household and employment growth respectively between 2012 and 2040.[50,51] The 2016-2040 RTP/SCS overall land use pattern reinforces the

48 Southern California Association of Governments (SCAG), 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS), April 2016.

49 SCAG, 2016-2040 RTP/SCS, April 2016.

50 SCAG, 2016-2040 RTP/SCS, April 2016, pp. 20, 75-77.

51 The Project Site is also located in a Transit Priority Area (TPA), which is defined as an area within 0.5-mile of a major transit stop that is existing or planned. A “major transit stop" is defined as a site containing an existing rail transit station or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

trend of focusing new housing and employment in the region's HQTAs. HQTAs are a cornerstone of land use planning best practice in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.

SCAG's 2016-2040 RTP/SCS provides specific strategies for implementation. These strategies include supporting projects that encourage a diverse job opportunities for a variety of skills and education, recreation and cultures and a full-range of shopping, entertainment and services all within a relatively short distance; encouraging employment development around current and planned transit stations and neighborhood commercial centers; encouraging the implementation of a "Complete Streets" policy that meets the needs of all users of the streets, roads and highways including bicyclists, children, persons with disabilities, motorists, electric vehicles, movers of commercial goods, pedestrians, users of public transportation, and seniors; and supporting alternative fueled vehicles.[52]

In addition, the 2016-2040 RTP/SCS includes strategies to promote active transportation, support local planning and projects that serve short trips, expand understanding and consideration of public health in the development of local plans and projects, and supports improvements in sidewalk quality, local bike networks, and neighborhood mobility areas. It also proposes increasing access to the California Coast Trail, light rail and bus stations, and promoting corridors that support biking and walking, such as through a regional greenway network and local bike networks. The 2016-2040 RTP/SCS proposes to better align active transportation investments with land use and transportation strategies, increase competitiveness of local agencies for federal and state funding, and to expand the potential for all people to use active transportation. CARB has accepted the SCAG GHG quantification determination in the 2016-2040 RTP/SCS and that the 2016-2040 RTP/SCS, if implemented, would achieve the 2020 and 2035 GHG emission reduction targets established by CARB.[53,54]

Although there are no per capita GHG emission reduction targets for passenger vehicles set by CARB for 2040, the 2016-2040 RTP/SCS GHG emission reduction trajectory shows that more aggressive GHG emission reductions are projected for 2040. By meeting and exceeding the SB 375 targets for 2020 and 2035, as well as achieving an approximately 21-percent decrease in per capita GHG emissions by 2040 (an additional 3-percent reduction in the five years between 2035 [18 percent] and 2040 [21 percent]), the 2016-2040 RTP/SCS is expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the State's GHG emission reduction goals.

52 SCAG, 2016-2040 RTP/SCS, April 2016, pp. 170-181.
53 SCAG, 2016-2040 RTP/SCS, April 2016, pp. 170-181.
54 CARB, Southern California Association of Governments' (SCAG) 2016 Sustainable Communities Strategy (SCS) ARB Acceptance of GHG Quantification Determination, June 2016.

(4) Local

(a) L.A.'s Green New Deal (Sustainable City pLAn 2019)

In April 2019, Mayor Eric Garcetti released L.A.'s Green New Deal (Sustainable City pLAn 2019). Rather than an adopted plan, the Green New Deal is a mayoral initiative that consists of a program of actions designed to create sustainability-based performance targets through 2050 that advance economic, environmental, and equity objectives.[55] L.A.'s Green New Deal (Sustainable City pLAn 2019) is the first four-year update to the City's first Sustainable City pLAn that was released in 2015. It augments, expands, and elaborates in even more detail L.A.'s vision for a sustainable future and it addresses climate change with accelerated targets and new aggressive goals.

While not a plan adopted solely to reduce GHG emissions, within L.A.'s Green New Deal (Sustainable City pLAn 2019), climate mitigation is one of eight explicit benefits that help define its strategies and goals. These include reducing GHG emissions through near-term outcomes:

- Reduce potable water use per capita by 22.5 percent by 2025; 25 percent by 2035; and maintain or reduce 2035 per capita water use through 2050.
- Reduce building energy use per square feet for all building types 22 percent by 2025; 34 percent by 2035; and 44 percent by 2050 (from a baseline of 68 mBTU/sqft in 2015).
- All new buildings will be net zero carbon by 2030 and 100 percent of buildings will be net zero carbon by 2050.
- Increase cumulative new housing unit construction to 150,000 by 2025; and 275,000 units by 2035.
- Ensure 57 percent of new housing units are built within 1,500 feet of transit by 2025; and 75 percent by 2035.
- Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides or transit to at least 35 percent by 2025, 50 percent by 2035, and maintain at least 50 percent by 2050.
- Reduce VMT per capita by at least 13 percent by 2025; 39 percent by 2035; and 45 percent by 2050.
- Increase the percentage of electric and zero emission vehicles in the city to 25 percent by 2025; 80 percent by 2035; and 100 percent by 2050.
- Increase landfill diversion rate to 90 percent by 2025; 95 percent by 2035 and 100 percent by 2050.
- Reduce municipal solid waste generation per capita by at least 15 percent by 2030, including phasing out single-use plastics by 2028 (from a baseline of 17.85 lbs. of waste generated per capita per day in 2011).

[55] City of Los Angeles, L.A.'s Green New Deal (Sustainable City pLAn 2019), 2019.

- Eliminate organic waste going to landfill by 2028.
- Reduce urban/rural temperature differential by at least 1.7 degrees by 2025; and 3 degrees by 2035.
- Ensure proportion of Angelenos living within 0.5 miles of a park or open space is at least 65 percent by 2025; 75 percent by 2035; and 100 percent by 2050.

(b) Los Angeles Green Building Code

In April 2008, the City adopted the Green Building Program Ordinance to address the impacts of new development. In 2011, 2014, and 2016, Chapter IX, Article 9, of the Los Angeles Municipal Code (LAMC), referred to as the Los Angeles Green Building Code, was amended to incorporate various provisions of the CALGreen Code. The Los Angeles Green Building Code includes mandatory requirements and elective measures for three categories of buildings: (1) low-rise residential buildings; (2) non-residential and high-rise residential buildings; and (3) additions and alterations to residential and non-residential buildings.

(c) Transportation Assessment Guidelines

The City of Los Angeles Department of Transportation (LADOT) has developed the City Transportation Assessment Guidelines (TAG) (July 2019) to provide the public, private consultants, and City staff with standards, guidelines, objectives, and criteria to be used in the preparation of a transportation assessment. The TAG establishes the reduction of vehicle trips and VMT as the threshold for determining transportation impacts and thus is an implementing mechanism of the City's strategy to reduce land use transportation-related GHG emissions consistent with AB 32, SB 32, and SB 375.

b) Existing Conditions

(1) Existing Statewide Greenhouse Gas Emissions

CARB compiles GHG inventories for the State of California. Based on the year 2017 GHG inventory data (the latest year for which data are available), California emitted 429.1 million metric tons of CO_2e ($MMTCO_2e$) which includes emissions resulting from imported electrical power.[56] Between 1990 and 2017, the population of California grew by approximately 9.7 million (from 29.8 to 39.5 million).[57,58] This represents an increase of approximately 33 percent from 1990 population levels. In addition, the California economy, measured as gross state product, grew from $773 billion in 1990 to $2.75 trillion in 2017, representing an increase of approximately three times the 1990 gross state

56 CARB, California Greenhouse Gas Inventory for 2000-2017– by Category as Defined in the 2008 Scoping Plan, last updated August 12, 2019.

57 United States Census Bureau, National and State Population Estimates: 1990-1994, 1995.

58 California Department of Finance, American Community Survey, 2017, http://www.dof.ca.gov/Reports/Demographic_Reports/American_Community_Survey/documents/Web_ACS2017_Pop-Race.xlsx.

product.[59] Despite the population and economic growth, California's net GHG emissions were reduced to below 1990 levels in 2016. According to CARB, the declining trend coupled with the State's GHG reduction programs (such as the Renewables Portfolio Standard, LCFS, vehicle efficiency standards, and declining caps under the Cap and Trade Program) demonstrate that California is on track to meet the 2020 GHG reduction target codified in HSC, Division 25.5, also known as AB 32 and amended by SB 32.[60] **Table IV.E-2**, *State of California Greenhouse Gas Emissions,* identifies and quantifies Statewide anthropogenic GHG emissions and sinks (e.g., carbon sequestration due to forest growth) in 1990 and 2017. As shown in the table, the transportation sector is the largest contributor to Statewide GHG emissions at approximately 40 percent in 2017.

TABLE IV.E-2
STATE OF CALIFORNIA GREENHOUSE GAS EMISSIONS

Category	Total 1990 Emissions using IPCC SAR ($MMTCO_2e$)	Percent of Total 1990 Emissions	Total 2017 Emissions using IPCC AR4 ($MMTCO_2e$)*	Percent of Total 2017 Emissions*
Transportation	150.7	35%	169.9	40%
Electric Power	110.6	26%	62.4	15%
Commercial	14.4	3%	15.1	4%
Residential	29.7	7%	26.0	6%
Industrial	103.0	24%	89.4	21%
Recycling and Waste [a]	–	–	8.9	2%
High GWP/Non-Specified [b]	1.3	<1%	20.0	5%
Agriculture/Forestry	23.6	6%	32.4	8%
Forestry Sinks	-6.7	--	-- [c]	--
Net Total (IPCC SAR)	**426.6**	**100%**	--	--
Net Total (IPCC AR4) [d]	**431**	**100%**	**424.1**	**100%**

* Totals may not add up exactly due to rounding.

[a] Included in other categories for the 1990 emissions inventory.

[b] High GWP gases are not specifically called out in the 1990 emissions inventory.

[c] Revised methodology under development (not reported for 2015).

[d] CARB revised the State's 1990 level GHG emissions using GWPs from the IPCC AR4.

SOURCES: CARB, Staff Report – California 1990 Greenhouse Gas Emissions Level and 2020 Emissions Limit, 2007; CARB, 2000-2017 Trends Figure Data, Figure 4.

59 California Department of Finance, Gross State Product, http://www.dof.ca.gov/Forecasting/Economics/Indicators/Gross_State_Product/documents/CA_GDP.xlsx. Amounts are based on current dollars as of the date of the report (May 2019).

60 CARB, Frequently Asked Questions for the 2016 Edition California Greenhouse Gas Emission Inventory, 2016.

(2) Existing Project Site Greenhouse Gas Emissions

For the purposes of this analysis, no existing operational GHG emissions are assumed from the existing AMDA-leased facility on the West Site because it is unknown whether the facility would relocate to another location and continue to operate. In addition, since the Capitol Records Complex on the East Site would continue to operate as under existing conditions, this analysis assumes the existing East Site operations would generate the same operational GHG emissions with or without the Project. Therefore, existing operational GHG emissions are not required to be calculated and the Project's GHG emissions would conservatively be considered entirely net new.

(3) Effects of Global Climate Change

The scientific community's understanding of the fundamental processes responsible for global climate change has improved over the past decade, and its predictive capabilities are advancing. However, there remain significant scientific uncertainties in, for example, predictions of local effects of climate change, occurrence, frequency, and magnitude of extreme weather events, effects of aerosols, changes in clouds, shifts in the intensity and distribution of precipitation, and changes in oceanic circulation. Due to the complexity of the Earth's climate system and inability to accurately model it, the uncertainty surrounding climate change may never be completely eliminated. Nonetheless, the IPCC, in its Fifth Assessment Report, Summary for Policy Makers, stated that, "it is *extremely likely* that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropogenic increase in greenhouse gas concentrations and other anthropogenic forcings [*sic*] together."[61] A report from the National Academy of Sciences concluded that 97 to 98 percent of the climate researchers most actively publishing in the field support the tenets of the IPCC in that climate change is very likely caused by human (i.e., anthropogenic) activity.[62]

According to CARB, the potential impacts in California due to global climate change may include: loss in snow pack; sea level rise; more extreme heat days per year; more high ozone days; more large forest fires; more drought years; increased erosion of California's coastlines and sea water intrusion into the Sacramento and San Joaquin Deltas and associated levee systems; and increased pest infestation.[63] Below is a summary of some of the potential effects that could be experienced in California as a result of global warming and climate change.

61 IPCC, Fifth Assessment Report, Summary for Policy Makers, 2013, p. 5.

62 Anderegg, William R. L., J.W. Prall, J. Harold, S.H., Schneider, Expert Credibility in Climate Change, Proceedings of the National Academy of Sciences of the United States of America. 2010;107:12107-12109.

63 CalEPA, Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, 2006.

(a) Air Quality

Higher temperatures, conducive to air pollution formation, could worsen air quality in California. Climate change may increase the concentration of ground-level ozone, but the magnitude of the effect and, therefore, its indirect effects, are uncertain. If higher temperatures are accompanied by drier conditions, the potential for large wildfires could increase, which, in turn, would exacerbate air quality. Additionally, severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the State.[64] However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains would temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thus ameliorating the pollution associated with wildfires.

In 2009, the California Natural Resources Agency (CNRA) published the California Climate Adaptation Strategy as a response to the Governor's Executive Order S-13-2008.[65] The CNRA report lists specific recommendations for State and local agencies to best adapt to the anticipated risks posed by a changing climate. In accordance with the California Climate Adaptation Strategy, the CEC was directed to develop a website on climate change scenarios and impacts that would be beneficial for local decision makers.[66] The website, known as Cal-Adapt, became operational in 2011.[67] The information provided on the Cal-Adapt website represents a projection of potential future climate scenarios. The data are comprised of the average values (i.e., temperature, sea-level rise, snowpack) from a variety of scenarios and models and are meant to illustrate how the climate may change based on a variety of different potential social and economic factors. According to the Cal-Adapt website, the portion of Los Angeles in which the Project Site is located could result in an average increase in temperature of approximately 4.7°F to 7.4°F by 2070–2099, compared to the baseline 1961–1990 period (73.3°F), which is a potential increase of approximately 6 to 10 percent.[68] Data suggest that the predicted future increase in temperatures as a result of climate change could potentially interfere with efforts to control and reduce ground-level ozone in the region.

(b) Water Supply

Uncertainty remains with respect to the overall impact of global climate change on future water supplies in California. Studies have found that, "Considerable uncertainty about precise impacts of climate change on California hydrology and water resources will remain until we have more precise and consistent information about how precipitation

64 CalEPA, Preparing California for Extreme Heat: Guidance and Recommendations, October 2013.

65 California Natural Resources Agency (CNRA), Climate Action Team, 2009 California Climate Adaptation Strategy: A Report to the Governor of the State of California in Response to Executive Order S-13-2008, 2009.

66 CNRA, Climate Action Team, 2009 California Climate Adaptation Strategy: A Report to the Governor of the State of California in Response to Executive Order S-13-2008, 2009.

67 The Cal-Adapt website address is: http://cal-adapt.org.

68 Cal-Adapt, Annual Average Maximum Temperatures for the Hollywood area of the City of Los Angeles, http://cal-adapt.org/tools/annual-averages/#climatevar=tasmax&scenario=rcp45&lat=34.09375&lng=118.34375&boundary=locagrid&units=fahrenheit, accessed February 18, 2019.

patterns, timing, and intensity will change."[69] For example, some studies identify little change in total annual precipitation in projections for California while others show significantly more precipitation. [70] Warmer, wetter winters would increase the amount of runoff available for groundwater recharge; however, this additional runoff would occur at a time when some basins are either being recharged at their maximum capacity or are already full.[71] Conversely, a reduced snowpack coupled with increased rainfall during winters could lead to reductions in spring runoff and higher evapotranspiration because of higher temperatures could reduce the amount of water available for recharge.[72]

The California Department of Water Resources report on climate change and effects on the State Water Project (SWP), the Central Valley Project, and the Sacramento-San Joaquin Delta, concludes that "climate change will likely have a significant effect on California's future water resources…[and] future water demand." It also reports that "much uncertainty about future water demand [remains], especially [for] those aspects of future demand that will be directly affected by climate change and warming. While climate change is expected to continue through at least the end of this century, the magnitude and, in some cases, the nature of future changes is uncertain."[73] It also reports that the relationship between climate change and its potential effect on water demand is not well understood, but "[i]t is unlikely that this level of uncertainty will diminish significantly in the foreseeable future." Still, changes in water supply are expected to occur, and many regional studies have shown that large changes in the reliability of water yields from reservoirs could result from only small changes in inflows.[74] In its Fifth Assessment Report, the IPCC states "Changes in the global water cycle in response to the warming over the 21st century will not be uniform. The contrast in precipitation between wet and dry regions and between wet and dry seasons will increase, although there may be regional exceptions."[75]

At the local level, as discussed in further detail in Section IV.N.2, *Water Supply*, of this Draft EIR, the Los Angeles Department of Water and Power (LADWP) Water Supply Assessment (WSA), which was approved on December 11, 2018, determined that adequate water supplies exist to meet the Project's projected water demand between 2015 and 2040, in addition to the existing and planned future demands on LADWP.[76]

69 Pacific Institute for Studies in Development, Environment and Security, Climate Change and California Water Resources: A Survey and Summary of the Literature, July 2003.

70 Pacific Institute for Studies in Development, Environment and Security, Climate Change and California Water Resources: A Survey and Summary of the Literature, July 2003.

71 Pacific Institute for Studies in Development, Environment and Security, Climate Change and California Water Resources: A Survey and Summary of the Literature, July 2003.

72 Pacific Institute for Studies in Development, Environment and Security, Climate Change and California Water Resources: A Survey and Summary of the Literature, July 2003.

73 California Department of Water Resources Climate Change Report, Progress on Incorporating Climate Change into Planning and Management of California's Water Resources, July 2006, p. 2-54.

74 California Department of Water Resources Climate Change Report, Progress on Incorporating Climate Change into Planning and Management of California's Water Resources, p. 2-75.

75 IPCC, Fifth Assessment Report, Summary for Policy Makers, 2013, p. 20.

76 Los Angeles Department of Water and Power (LADWP), Water Supply Assessment (WSA), December 11, 2018, p. 5. Provided in Appendix P-2 of this Draft EIR.

(c) Hydrology and Sea Level Rise

As discussed above, climate change could potentially affect: the amount of snowfall, rainfall and snow pack; the intensity and frequency of storms; flood hydrographs (flash floods, rain or snow events, coincidental high tide and high runoff events); sea level rise and coastal flooding; coastal erosion; and the potential for salt water intrusion. Sea level rise can be a product of global warming through two main processes: expansion of seawater as the oceans warm, and melting of ice over land. A rise in sea levels could result in coastal flooding and erosion and could jeopardize California's water supply. Increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

(d) Agriculture

California has a $30-billion agricultural industry that produces half the country's fruits and vegetables. Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, water demand could increase; crop-yield could be threatened by a less reliable water supply; and greater ozone pollution could render plants more susceptible to pest and disease outbreaks. In addition, temperature increases could change the time of year certain crops, such as wine grapes, bloom or ripen, and thus affect their quality.[77]

(e) Ecosystems and Wildlife

Increases in global temperatures and the potential resulting changes in weather patterns could have ecological effects on a global and local scale. Increasing concentrations of GHGs are likely to accelerate the rate of climate change. Scientists expect that the average global surface temperature could rise by 2-11.5°F (1.1-6.4°C) by 2100, with significant regional variation.[78] Soil moisture is likely to decline in many regions, and intense rainstorms are likely to become more frequent. Sea level could rise as much as 2 feet along most of the United States coastline. Rising temperatures could have four major impacts on plants and animals: (1) timing of ecological events; (2) geographic range; (3) species' composition within communities; and (4) ecosystem processes such as carbon cycling and storage.[79]

77 California Climate Change Center, Our Changing Climate: Assessing the Risks to California, July 2006.

78 National Research Council, Advancing the Science of Climate Change, 2010.

79 Parmesan, C., and H. Galbraith, Observed Impacts of Global Climate Change in the U.S., Prepared for the Pew Center on Global Climate Change, November 2004.

3. Project Impacts

a) Threshold of Significance

(1) CEQA Guidelines Appendix G

In accordance with Appendix G of the State CEQA Guidelines, a project would have a significant impact related to GHGs if it would:

Threshold (a): Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or

Threshold (b): Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

Amendments to CEQA Guidelines Section 15064.4 were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions. CEQA Guidelines Section 15064.4 gives lead agencies the discretion to determine whether to assess those emissions quantitatively or qualitatively. If a qualitative analysis is used, in addition to quantification, this section recommends certain qualitative factors that may be used in the determination of significance (i.e., extent to which the project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs). The amendments to CEQA Guidelines Section 15064.4 do not establish a threshold of significance; rather, lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions, including looking to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), so long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)).

The California Natural Resources Agency has also clarified that the Guidelines Amendments focus on the effects of GHG emissions as cumulative impacts, and that they should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see CEQA Guidelines Section 15064(h)).[80]

Although GHG emissions can be quantified as discussed above under Subsection IV.E.3.b, *Methodology*, CARB, SCAQMD, and the City have not adopted quantitative project-level significance thresholds for GHG emissions that would be applicable to the Project. The Governor's Office of Planning and Research (OPR) released a technical advisory on CEQA and climate change that provided some guidance on assessing the significance of GHG emissions, and states that "lead agencies may undertake a project-

80 See generally CNRA, Final Statement of Reasons for Regulatory Action, December 2009, pp. 11-13, 14, and 16; see also Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, Secretary for Natural Resources, April 13, 2009.

by-project analysis, consistent with available guidance and current CEQA practice," and that while "climate change is ultimately a cumulative impact, not every individual project that emits GHGs must necessarily be found to contribute to a significant cumulative impact on the environment."[81] Furthermore, the technical advisory states that "CEQA authorizes reliance on previously approved plans and mitigation programs that have adequately analyzed and mitigated GHG emissions to a less than significant level as a means to avoid or substantially reduce the cumulative impact of a project."[82]

As indicated above, the CEQA Guidelines were amended in response to SB 97. In particular, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project.[83] To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency.[84] Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, [and] plans or regulations for the reduction of greenhouse gas emissions."[85]

Thus, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of non-significance for GHG emissions if a project complies with a program and/or other regulatory schemes to reduce GHG emissions.[86]

81 See generally CNRA, Final Statement of Reasons for Regulatory Action, December 2009, pp. 11-13, 14, and 16; see also Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, Secretary for Natural Resources, April 13, 2009

82 Governor's Office of Planning and Research, Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review.

83 CCR, Title 14, Section 15064(h)(3).

84 CCR, Title 14, Section 15064(h)(3).

85 CCR, Title 14, Section 15064(h)(3).

86 See, for example, San Joaquin Valley Air Pollution Control District (SJVAPCD), CEQA Determinations of Significance for Projects Subject to ARB's GHG Cap-and-Trade Regulation, APR-2025 (June 25, 2014), in which the SJVAPCD "determined that GHG emissions increases that are covered under ABR's Cap-and-Trade regulation cannot constitute significant increases under CEQA…" Furthermore, the SCAQMD has taken this position in CEQA documents it has produced as a lead agency. The SCAQMD has prepared three Negative Declarations and one Draft Environmental Impact Report that demonstrate the SCAQMD has applied its 10,000 $MTCO_2e$/yr significance threshold in such a way that GHG emissions covered by the Cap-and-Trade Program do not constitute emissions that must be measured against the threshold. See SCAQMD, Final Negative Declaration for Ultramar Inc. Wilmington Refinery Cogeneration Project, SHC No. 2012041014, October 2014; SCAQMD, Final Negative Declaration for Phillips 99 Los Angeles Refinery Carson Plant—Crude Oil Storage Capacity Project, SCH No. 2013091029, December 2014; SCAQMD, Final Mitigated Negative Declaration for Toxic Air Contaminant Reduction for Compliance with SCAQMD Rules 1420.1 and 1402 at the Exide Technologies Facility in Vernon, CA, SCH No. 2014101040, December 2014; and SCAQMD, Final

CARB's Climate Change Scoping Plan, SCAG's 2016-2040 RTP/SCS, L.A.'s Green New Deal (Sustainable City pLAn 2019), and the Los Angeles Green Building Code all apply to the Project and are all intended to reduce GHG emissions to meet the Statewide targets set forth in AB 32 and amended by SB 32. Thus, in the absence of any adopted quantitative threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions, including CARB's 2017 Climate Change Scoping Plan, SCAG's 2016-2040 RTP/SCS, L.A.'s Green New Deal (Sustainable City' pLAn 2019), and the Los Angeles Green Building Code.

(2) SCAQMD Thresholds

As discussed above, the SCAQMD has an interim GHG significance threshold of 10,000 $MTCO_2e$ per year for stationary source/industrial projects where the SCAQMD is the lead agency. This SCAQMD interim GHG significance threshold is not applicable to the Project, as the Project does not include industrial uses with significant stationary sources and the City of Los Angeles is the Lead Agency.

(3) 2006 L.A. CEQA Thresholds Guide

The 2006 L.A. CEQA Thresholds Guide does not identify any criteria to evaluate GHG emissions impacts. Thus, the potential for the Project to result in impacts from GHG emissions is based on the CEQA Guidelines Appendix G thresholds. For the reasons set forth above, to answer both of the above questions, the City will consider whether the Project is consistent with AB 32, SB 32, SB 375 (through demonstration of conformance with the 2016–2040 RTP/SCS), L.A.'s Green New Deal (Sustainable City' pLAn 2019), and the Los Angeles Green Building Code. As discussed above, OPR has noted that lead agencies "should make a good-faith effort to calculate or estimate GHG emissions from a project."[87] GHG emissions are quantified below, consistent with OPR guidelines.

b) Methodology

(1) Project Consistency with Applicable Plans and Policies

The Project's GHG emission impacts are evaluated by assessing the Project's consistency with applicable GHG reduction strategies and local actions approved or adopted by CARB, SCAG, and the City. As there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the methodology for evaluating the Project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG

Environmental Impact Report for the Breitburn Santa Fe Springs Blocks 400/700 Upgrade Project, SCH No. 2014121014, August 2015.

87 Governor's Office of Planning and Research, Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, 2008.

emissions. This evaluation of consistency with such plans is the sole basis for determining the significance of the Project's GHG-related impacts on the environment.

As discussed previously, the City has established goals and actions to reduce the emission of GHGs from both public and private activities in L.A.'s Green New Deal (Sustainable City pLAn 2019), and the Los Angeles Green Building Code. Thus, if a project is designed in accordance with these policies and regulations, it would result in a less than significant impact, because it would be consistent with the overarching State regulations on GHG reduction (AB 32).

A consistency analysis is provided and describes the Project's compliance with performance-based standards included in the regulations outlined in the applicable portions of CARB Scoping Plans (i.e., 2008 Scoping Plan, 2014 Scoping Plan, and 2017 Scoping Plan), the 2016-2040 RTP/SCS, L.A.'s Green New Deal (Sustainable City pLAn 2019), and the Los Angeles Green Building Code.

(2) Quantification of Emissions

In addition to the evaluation of the Project's consistency with plans adopted for the purpose of reducing and/or mitigating GHG emissions, for informational purposes, the analysis also calculates the amount of GHG emissions that would be attributable to the Project using recommended air quality models, as described below. The primary purpose of quantifying the Project's GHG emissions is to satisfy CEQA Guidelines Section 15064.4(a), which requires a good-faith effort by the lead agency to describe and calculate emissions. The estimated emissions inventory is also used to determine if there would be a reduction in the Project's incremental contribution of GHG emissions as a result of compliance with regulations and requirements adopted to implement plans for the reduction or mitigation of GHG emissions. The significance of the Project's GHG emissions impacts is not based on the amount of GHG emissions resulting from the Project.

The California Climate Action Registry (Climate Registry) has prepared the General Reporting Protocol for calculating and reporting GHG emissions from a number of general and industry-specific activities.[88] The GHG emissions provided in this report are consistent with the General Reporting Protocol framework. The General Reporting Protocol recommends separating GHG emissions into three categories that reflect different aspects of ownership or control over emissions. They include the following:

- Scope 1: Direct, on-site combustion of fossil fuels (e.g., natural gas, propane, gasoline, and diesel).
- Scope 2: Indirect, off-site emissions associated with purchased electricity or purchased steam.

88 The Climate Registry, General Reporting Protocol Version 2.1, 2016.

- Scope 3: Indirect emissions associated with other emissions sources, such as third-party vehicles and embodied energy.[89]

CARB recommends consideration of indirect emissions to provide a more complete picture of the GHG footprint of a facility: "As facilities consider changes that would affect their emissions – addition of a cogeneration unit to boost overall efficiency even as it increases direct emissions, for example – the relative impact on total (direct plus indirect) emissions by the facility should be monitored. Annually reported indirect energy usage also aids the conservation awareness of the facility and provides information" to CARB to be considered for future strategies by the industrial sector.[90] For these reasons, CARB has proposed requiring the calculation of direct and indirect GHG emissions as part of the AB 32 reporting requirements. Additionally, the Office of Planning and Research directs lead agencies to "make a good-faith effort, based on available information, to calculate, model, or estimate…GHG emissions from a project, including the emissions associated with vehicular traffic, energy consumption, water usage and construction activities."[91] Therefore, direct and indirect emissions have been calculated for the Project.

A fundamental challenge in the analysis of GHG emissions is the global nature of the existing and cumulative future conditions. Changes in GHG emissions can be difficult to attribute to a particular project because the project may cause a shift in the locale for some type of GHG emissions, rather than simply causing "new" GHG emissions. As a result, there is a lack of clarity as to whether a project's GHG emissions represent a net global increase, reduction, or no change in GHGs that would exist if the project were not implemented. Therefore, the analysis of the Project's GHG emissions is conservative in that it assumes all of the GHG emissions are new additions to the atmosphere.

It is considered reasonable and consistent with criteria pollutant calculations to consider those GHG emissions resulting from Project-related incremental (net) increases from emissions sources mentioned in the scope categories above such as emissions from the use of on-road mobile vehicles, electricity, and natural gas compared to existing conditions. This includes Project construction activities such as demolition, hauling, and construction worker trips. This analysis also considers indirect GHG emissions from water conveyance, wastewater generation, and solid waste handling. Since potential impacts resulting from GHG emissions are long-term rather than acute, GHG emissions are calculated on an annual basis.

GHG emissions are estimated using the California Emissions Estimator Model (CalEEMod, version 2016.3.2), which is a Statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and

89 Embodied energy includes energy required for water pumping and treatment for end-uses. Third-party vehicles include vehicles used visitors of the Project Site.

90 CARB, Staff Report: Initial Statement of Reasons for Rulemaking, Revisions to the Regulation for Mandatory Reporting of Greenhouse Gas Emissions Pursuant to the California Global Warming Solutions Act of 2006 (AB 32), 2010, p. 27.

91 Governor's Office of Planning and Research, Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, 2008, p. 5.

environmental professionals to quantify potential criteria pollutant and GHG emissions from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California. Regional data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air districts to account for local requirements and conditions. The model is considered to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.[92]

(a) Construction Emissions

Consistent with the assumptions made in the air quality analysis provided in Section IV.B, *Air Quality*, of this Draft EIR, GHG emissions during construction are forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date). To allow for necessary flexibility in terms of construction scheduling, logistical site needs, and a conservative evaluation of potential construction-related environmental impacts, this Draft EIR considers two potential construction scenarios where applicable: a scenario where construction of the West and East Sites have some overlap (overlapping scenario, with shorter overall construction duration), and a scenario where construction of the West and East Sites are entirely separate and sequential where there would be no overlap (sequential construction scenario, with an extended construction duration).

Under the overlapping construction scenario, the Utilities/Trenching, Site Preparation, and early Grading/Excavation phases could begin on the East Site while the West Site is in the Building Construction phase. In this overlapping construction scenario, construction could be completed in approximately 4.5 years (beginning 2021 and complete in 2025). Under the sequential construction scenario, construction of the West and East Sites are entirely separate and sequential where there would be no overlap (sequential construction scenario, extended construction duration). In this scenario, construction would be completed over an approximately seven-year period (beginning in 2021 and completion in 2027).

If the onset of construction is delayed to a later date than assumed in the modeling analysis, construction impacts would be similar to or less than those analyzed, because a more energy-efficient and cleaner burning construction equipment and vehicle fleet mix would be expected in the future. This is because State regulations require construction equipment fleet operators to phase-in less polluting heavy-duty equipment and trucks over time. As a result, should the Project commence construction on a later date than modeled in this GHG impact analysis, GHG impacts would be less than the impacts disclosed herein.

The output values used in this analysis were adjusted to be Project-specific based on equipment types and the construction schedule. These values were then applied to the same construction phasing assumptions used in the criteria pollutant analysis (see

92 See: http://www.aqmd.gov/caleemod/.

Section IV.B, *Air Quality*, of this Draft EIR) to generate GHG emissions values for each construction year. The emissions have been estimated using the CalEEMod software, an emissions inventory software program recommended by SCAQMD, and the CARB on-road vehicle emissions factor model (EMFAC). The SCAQMD guidance, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, recognizes that construction-related GHG emissions from projects "occur over a relatively short-term period of time" and that "they contribute a relatively small portion of the overall lifetime project GHG emissions."[93]

In accordance with SCAQMD guidance, GHG emissions from construction have been amortized (i.e., averaged annually) over the lifetime of the Project. The SCAQMD defines the lifetime of a project as 30 years. [94] Therefore, the Project's total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate comparable to operational emissions. A more detailed discussion of the methodology for projecting the Project construction emissions and descriptions of the Project's construction phasing and equipment list are available in the AQ/GHG Technical Appendix for the Project, which is provided in Appendix E of this Draft EIR.

(b) Operational Emissions

Similar to construction, operational GHG emissions are also estimated using CalEEMod, along with CARB's on-road vehicle emissions factor model (EMFAC). CalEEMod was used to estimate GHG emissions from electricity, natural gas, solid waste, water and wastewater, mobile sources, and landscaping equipment. Mobile source emissions were estimated based on EMFAC, which is also incorporated into CalEEMod. Because the West Site would be completed first in year 2024 and operational before completion of the East Site, operational GHG emissions for the West Site in year 2024 were analyzed and presented in this analysis. In addition, operational GHG emissions for buildout of both the West Site and East Site in year 2025 (i.e., buildout under the overlapping construction scenario) and year 2027 (i.e., buildout under the sequential construction scenario) were analyzed and presented in this analysis. For informational purposes, operational GHG emissions were calculated for the following two GHG conditions to estimate GHG reductions associated with Project GHG reduction characteristics:

- **Project Without GHG Reduction Characteristics, Features, and Measures**: Represents emissions based on a scenario consistent with CARB's Scoping Plan Statewide NAT forecast for the AB 32 target year of 2020, includes CARB's suggested emission factor of 595 lbs/MWh for year 2020, which represents the State's Renewable Portfolio Standard (RPS) law and growth in electricity demand, but does not include the project design features and certain VMT reductions from the Project's Transportation Assessment and land use characteristics such as increased destination accessibility and increased transit ability discussed in the CAPCOA

93 SCAQMD, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, October 2008.

94 SCAQMD, Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans, December 5, 2008, p. 5.

guidance on mitigating or reducing GHG emissions from land use development projects as well as reductions resulting from the Project's Transportation Demand Management (TDM), Quantifying Greenhouse Gas Mitigation Measures (CAPCOA guidance document).[95,96]

- **Project With GHG Reduction Characteristics, Features, and Measures (Project)**: Represents emission factors from the Project in the year 2024 for the first operational year of the West Site and in the year 2025 for the first full operational year of the Project Build out under the overlapping construction scenario, and in the year 2027 for first full operational year of full Project buildout after the East Site is completed under the sequential construction scenario. Both construction scenarios result in two potential buildout scenarios for the East Site: the Project and the Project with the East Site Hotel Option (see Chapter II, *Project Description,* of this Draft EIR for additional details). These future year CO_2 emission factors of 497 lbs/MWh and 444 lbs/MWh were scaled proportionately based on the future year renewable energy targets of 44 percent by 2024 and at least 50 percent by 2027, and includes all Project design features and VMT reductions from the Project's Transportation Assessment[97] and land use characteristics discussed in the CAPCOA guidance document.[98]

As previously noted, operational mobile source GHG emissions are estimated based on CARB's on-road vehicle emissions factor (EMFAC) model. Mobile source emissions are based on VMT from the Transportation Assessment (TA) prepared by Fehr & Peers for the Project. The trip lengths are based on the location and urbanized setting of the project area. The average trip length of each land use is the sum of the trip length of each trip type multiplied by the percentage of trip type. The VMT calculated for the Project was based on the trip generation rates provided in the Project's Transportation Assessment,

95 California Air Pollution Control Officers Association (CAPCOA), Quantifying Greenhouse Gas Mitigation Measures, August 2010, p. 162.

96 The total VMT reduction taken due to the Project Site's land use characteristics and the Project's TDM Program was conservatively limited to 30 percent. While the reductions from the land use characteristics and TDM Program combined would result in VMT reductions greater than 30 percent, the CAPCOA guidance document recommends using a maximum of 30 percent reductions due to Land Use/Location Transportation measures for compact/infill projects. This analysis conservatively applies the 30 percent limit to this Project Site, even though the Project area meets the characteristics for an urban setting with respect to typical building heights of 6 stories or much higher, grid street pattern, minimal setbacks, constrained parking, high parking prices, and high quality rail service (i.e., Metro Red Line). While the Project meets some of the characteristics for the urban setting, for the purposes of this analysis, the Project is assumed to be located in a compact infill setting. Thus, it is possible that the Project could achieve higher levels of VMT reduction than is indicated in this assessment since the Project area meets some of the characteristics of the urban setting. Therefore, the Project Without GHG Reduction Characteristics, Features, and Measures scenario's VMT was modeled at 30 percent greater compared to Proposed Project scenario VMT.

97 Fehr & Peers, Transportation Assessment for the Hollywood Center Project, March 2020. Provided as Appendix N-1 of this Draft EIR.

98 CARB, Statewide Emission Factors (EF) For Use With AB 900 Projects, January 2017. The emission factor of 595 pounds CO_2/MWh is from the California LEV III Initial Statement Of Reasons (ISOR, Dec. 7, 2011). This document is provided in Appendix B of this Draft EIR.

which accounts for trip reductions from internal capture,[99] existing public transportation options, the TDM Program, and pass-by trips.[100]

In addition, the operational mobile source GHG emissions estimates are based on GHG emission factors for the mobile sources and the GWP values for the GHGs emitted. Emissions of GHGs from motor vehicles are dependent on specific vehicle types and models that would travel to and from the Project Site. The national policy for fuel efficiency and emissions standards for the United States auto industry requires that new passenger cars and light-duty trucks achieve an average fuel economy standard of 35.5 miles per gallon (mpg) and 250 grams of CO_2 per mile by model year 2016 (Phase I standards), based on USEPA calculation methods. In August 2012, more stringent phased-in standards were adopted for new model year 2017 through 2025 passenger cars and light-duty trucks. New model year 2020 vehicles are projected to achieve 41.7 mpg (if GHG reductions are achieved exclusively through fuel economy improvements) and 213 grams of CO_2 per mile (Phase II standards). By 2025, new vehicles are required to achieve 54.5 mpg (if GHG reductions are achieved exclusively through fuel economy improvements) and 163 grams of CO_2 per mile (Phase II standards).[101] However, as mentioned above in Subsection IV.E.2(1), *Regulatory Framework – Federal,* in August 2018, the EPA proposed the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule that would, if adopted, maintain the CAFE and CO_2 standards applicable in model year 2020 for model years 2021 through 2026. In September 2019, the USEPA published the final rule in the federal register (Federal Register, Vol. 84, No. 188, Friday, September 27, 2019, Rules and Regulations, 51310-51363). The USEPA also published the final rule for the One National Program on Federal Preemption of State Fuel Economy Standards that finalizes critical parts of the SAFE Vehicles Rule and makes clear that federal law preempts state and local tailpipe GHG emissions standards as well as zero emission vehicle (ZEV) mandates. California and 23 other states and environmental groups in November 2019 in U.S. District Court in Washington, filed a petition for the EPA to reconsider the published rule. The Court has not yet ruled on the lawsuits. The vehicle emissions standards beyond model year 2020 may not occur if the Federal SAFE Vehicles Rules and the One National Program on Federal Preemption of State Fuel Economy Standards are upheld by the Courts. The most current version of the CARB and USEPA-approved EMFAC2017 on-road vehicle emissions model does not account for the effect of the SAFE Vehicles Rules. While CARB has provided off-model adjustment factors for criteria pollutant emissions,[102] CARB has not provided adjustment factors for GHG emissions. However, given that the adjustment factors for gaseous exhaust criteria pollutant factors is an increase of

99 Internal capture is generally defined as the portion of trips generated by a mixed-use development that both begin and end within the development.

100 Fehr & Peers, Transportation Assessment for the Hollywood Center Project, March 2020. Provided as Appendix N-1 of this Draft EIR.

101 USEPA, EPA and NHTSA Set Standards to Reduce Greenhouse Gases and Improve Fuel Economy for Model Years 2017-2025 Cars and Light Trucks, August 2012.

102 CARB, EMFAC Off-Model Adjustment Factors to Account for the SAFE Vehicle Rule Part One, November 20, 2019.

approximately 1 percent or less, it is reasonable to assume a similar effect on GHG emissions, which are also gaseous pollutants.

All vehicle types would visit the Project Site. Therefore, this assessment uses Los Angeles County's motor vehicle fleet mix and the fleet average calendar year emissions factors from EMFAC to estimate mobile source GHG emissions. Mobile source emissions are estimated for calendar years 2024 and 2025 corresponding to when the West Site buildout and full Project buildout are anticipated under the overlapping construction scenario; and for calendar years 2024 and 2027 corresponding to when the West Site buildout and full Project buildout are anticipated under the sequential construction scenario.

With regard to energy demand, the consumption of fossil fuels to generate electricity and to provide heating and hot water generates GHG emissions. Emissions of GHGs associated with energy usage under the Project's proposed land uses are calculated using the CalEEMod tool. Future fuel consumption rates are estimated based on specific square footage of the residential, retail, and restaurant land uses, as well as predicted water supply needs of the Project. CalEEMod then bases GHG emissions related to the Project's estimated energy demand using the GHG emission factors for the electricity and natural gas utilities providers' CO_2e intensity factors for supplied electricity and natural gas. Based on data obtained from CARB staff, "[i]f an applicant would like to use an EF [emission factor] that represents RPS law and growth in electricity demand, the EF of 595 [pounds] CO_2/MWh may be used."[103] According to CARB staff, the "EF represents a 'marginal' supply profile for new generation that will be added to the grid in the years 2020 and beyond, and is consistent with the methodology used in state emission rule impact assessments."[104] Therefore, consistent with the CARB staff recommendation, a CO_2 intensity factor of 595 pounds of CO_2 per MWh applies to operational electricity emissions between 2020 and 2023. However, as discussed above, because the first full operational year would be 2024 for the West Site and 2025 or 2027 for the East Site, depending on the construction scenario, the future year CO_2 emissions factor of 497 lbs/MWh was used for years 2024 and 2025 and 444 lbs/MWh was used for year 2027. These factors were scaled proportionately assuming LADWP would achieve the future year renewable energy targets of 44 percent by 2024 and at least 50 percent by 2027.[105,106] Emission factors for CH_4 and N_2O were obtained from CalEEMod.[107]

103 CARB, Statewide Emission Factors (EF) For Use With AB 900 Projects, January 2017.
104 CARB, Statewide Emission Factors (EF) For Use With AB 900 Projects, January 2017.
105 LADWP, 2017 Power Strategic Integrated Long-Term Resource Plan, p. ES-18.
106 As described in SB100, the CO_2 intensity factor of 595 lbs/MWh would reflect a 33 percent by 2020. For year 2024, SB100 requires a RPS of 44 percent, so the scaled CO_2 intensity factor would be 497 lbs/MWh. For year 2027, SB100 requires a RPS of 50 percent, so the scaled CO_2 intensity factor would be 444 lbs/MWh.
107 CAPCOA, California Emissions Estimator Model, http://www.caleemod.com/, accessed February 27, 2020.

Emissions of GHGs associated with solid waste disposal under the Project's proposed land uses are calculated using the CalEEMod tool. The emissions are based on the size of the residential, commercial, restaurant, open space, and parking structure land uses, the waste disposal rate for the land uses, the waste diversion rate, the GHG emission factors for solid waste decomposition, and the GWP values for the GHGs emitted.[108] Refer to Section IV.N.3, *Solid Waste*, of this Draft EIR for estimated solid waste disposal and diversion rates from the Project.

The emissions of GHGs associated with water demand and wastewater generation from the Project are calculated using CalEEMod. The emissions are based on the size of the existing land uses, the water demand factors, the electrical intensity factors for water supply, treatment, and distribution and for wastewater treatment, the GHG emission factors for the electricity utility provider, and the GWP values for the GHGs emitted.[109] Refer to Section IV.N.2, *Water Supply*, of this Draft EIR for the estimated water usage rate for the Project.

The emissions of GHGs associated with operational area sources under the Project are calculated using the CalEEMod tool. The emissions for landscaping equipment are based on the size of the open space required based on residential, commercial and restaurant land uses, the GHG emission factors for fuel combustion, and the GWP values for the GHGs emitted.

Stationary source emissions may include emissions from maintenance and testing operations of emergency generators. Stationary sources would include on-site emergency generators on the West Site and East Site with an estimated capacity rated at approximately 1,500 kilowatts (2,012 horsepower) for each site, which would provide emergency power primarily for lighting and other emergency building systems. Emergency generator emissions are calculated based on emissions factors available from CARB and the SCAQMD in compliance with applicable regulations. Emissions of GHGs would be generated during maintenance and testing operations and emissions were estimated separately outside of the CalEEMod software. Emergency generator emissions include compliance with CARB and SCAQMD regulations including SCAQMD Rule 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines) mandated emission limits and operating hour constraints. As discussed previously, Rule 1470 applies to stationary compression ignition engine greater than 50 brake horsepower and sets limits on emissions and operating hours. In general, new stationary emergency standby diesel-fueled engines greater than 50 brake horsepower are not permitted to operate more than 50 hours per year for maintenance and testing. Emergency generator GHG emissions are the same for both the Project and the Project with the East Site Hotel Option.

Stationary sources would also include on-site cooling towers to assist in dissipating heat from commercial processes, such as commercial heating, ventilation and air conditioning

108 CAPCOA, California Emissions Estimator Model, User's Guide For CalEEMod Version 2016.3.2.
109 CAPCOA, California Emissions Estimator Model, User's Guide For CalEEMod Version 2016.3.2.

(HVAC) systems, of the project. The Project's cooling towers would utilize a flow rate of 10,938 gallons per day and utilize a flow rate of 16,719 gallons per day under the Project with the East Site Hotel Option (refer to Section IV.N.2*, Water Supply*, of this Draft EIR). The cooling towers would result in emissions due to the required energy to supply, distribute, and treat the water used and emissions were estimated separately outside of the CalEEMod software.

Emissions calculations also include credits or reductions for the Project Design Features and GHG reducing measures, some of which are required by regulation, such as compliance with SCAQMD rules and regulations and reductions in energy and water demand. Since the Project is subject to the Los Angeles Green Building Code, Project Design Features reflect the minimum requirements. Additionally, this Project is committed to achieving the USGBC Leadership in Energy and Environmental Design (LEED) Gold Certification or equivalent rating.

CAPCOA has provided guidance on mitigating or reducing GHG emissions from land use development projects. In September 2010, CAPCOA released a guidance document titled Quantifying Greenhouse Gas Mitigation Measures which provides GHG reduction values for recommended GHG reduction strategies.[110] These strategies serve to reduce VMT and vehicle trips, which correspond to a reduction in relative GHG emissions. The CAPCOA guidance document was utilized in this analysis for quantifying reductions from physical and operational Project characteristics and Project Design Features in CalEEMod. Detailed GHG emissions calculations are provided in Appendix E of this Draft EIR.

There are challenges in determining consumption-based GHG emissions for embodied GHG emissions such as the production of construction materials and consumer goods and services include that many require elongated supply chains. Therefore, the data necessary to accurately quantify embodied emissions may not be readily available due to the fact that other jurisdictions (particularly outside California or outside the United States) may not track GHG emissions in sufficient detail and, in part due to business practices concerning proprietary data. Furthermore, as discussed in the Draft AEP White Paper: Production, Consumption and Lifecycle Greenhouse Gas Inventories: Implications for CEQA and Climate Action Plans, "CEQA admonishes lead agencies to avoid speculation in completing their analyses and making conclusions. Furthermore, CEQA does not require a lead agency to complete every study possible, but rather to fully disclose impacts based on reasonably available data. Developing project-specific estimates of embedded GHG emissions for all construction materials, or future consumed goods and services that are related to complex supply chains, would require extensive research and may not be able to accurately identify GHG emissions for many consumed items without substantial uncertainty."[111]

110 CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, August 2010.

111 Association of Environmental Professionals, Draft AEP White Paper - Production, Consumption and Lifecycle Greenhouse Gas Inventories: Implications for CEQA and Climate Action Plans, 2017, p. 5-3.

In addition, the State addressed embodied (lifecycle) GHG emissions in the Final Statement of Reasons for Regulatory Action, prepared for the amendment to Appendix F of the CEQA Guidelines pursuant to SB 97:

> *The amendments to Appendix F remove the term —lifecycle. No existing regulatory definition of —lifecycle exists. In fact, comments received during OPR's public workshop process indicate a wide variety of interpretations of that term. (Letter from Terry Rivasplata et al. to OPR, February 2, 2009, at pp. 5, 12 and Attachment; Letter from Center for Biological Diversity et al. to OPR, February 2, 2009, at pp. 17.) Thus, retention of the term —lifecycle in Appendix F could create confusion among lead agencies regarding what Appendix F requires. Moreover, even if a standard definition of the term —lifecycle existed, requiring such an analysis may not be consistent with CEQA. As a general matter, the term could refer to emissions beyond those that could be considered —indirect effects of a project as that term is defined in section 15358 of the State CEQA Guidelines. Depending on the circumstances of a particular project, an example of such emissions could be those resulting from the manufacture of building materials. (CAPCOA White Paper, pp. 50-51.) CEQA only requires analysis of impacts that are directly or indirectly attributable to the project under consideration. (State CEQA Guidelines, § 15064(d).) In some instances, materials may be manufactured for many different projects as a result of general market demand, regardless of whether one particular project proceeds. Thus, such emissions may not be caused by the project under consideration. Similarly, in this scenario, a lead agency may not be able to require mitigation for emissions that result from the manufacturing process. Mitigation can only be required for emissions that are actually caused by the project. (State CEQA Guidelines, § 15126.4(a)(4).)*[112]

Therefore, embodied GHG emissions were not considered in this analysis as they are not consistent with generally recommended GHG emissions analysis methodology under CEQA.

(3) Comparison to Project without Reduction Features Scenario

As discussed previously, State, regional, and local GHG reduction plans and policies, such as CARB's Climate Change Scoping Plan, SCAG's 2016-2040 RTP/SCS, L.A.'s Green New Deal (Sustainable City pLAn 2019), and the Los Angeles Green Building Code would be applicable to the Project. These plans and policies are intended to reduce GHG emissions in accordance with the goals of AB 32. In order to evaluate the efficacy of the GHG reduction characteristics, features, and measures that would be implemented as part of the Project as required by these GHG reduction plans and policies, this analysis

[112] CNRA, Final Statement of Reasons for Regulatory Action – Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB 397, p. 71.

compares the Project's GHG emissions to the emissions that would be generated by the Project without implementation of GHG reduction characteristics, features, and measures. This approach mirrors the concepts used in CARB's Climate Change Scoping Plan, which demonstrates GHG reductions compared to a Project without Reduction Features scenario. This comparison is provided only to evaluate the Project's efficiency with respect to GHG reduction plans and policies, but is not relied on as a threshold of significance.

The GHG emissions that would be generated by the Project without implementation of GHG reduction characteristics, features, and measures is quantified based on specific and defined circumstances in the context of relevant State activities and mandates. Since this comparison is intended to mirror the concepts used in CARB's Climate Change Scoping Plan, the GHG emissions for the Project without implementation of GHG reduction characteristics, features, and measures is evaluated based on the specific and defined circumstances that CARB relied on when it projected the State's GHG emissions in the absence of GHG reduction measures in the First Update to the Climate Change Scoping Plan.

The specific and defined circumstances used by CARB include conditions that existed during the 2009 to 2011 period, which include the vehicle fleet regulations that existed during the 2009 to 2011 period and the 2008 Title 24 Building Energy Efficiency Standards. The specific Project Site characteristics and Project Design Features such as GHG-PDF-1 (Green Building Features – described below) and WS-PDF-1 (Water Conservation Features, refer to Section IV.N.2, *Water Supply*, of this Draft EIR) are not included as they encompass GHG reduction strategies and features that would be consistent with State, regional, and local GHG reduction plans and policies or would go above and beyond regulatory requirements. The emissions are estimated using the CalEEMod software, and the model inputs are adjusted to account for the specific and defined circumstances and described above. The analysis assumes the Project without implementation of GHG reduction characteristics, features, and measures and would incorporate the same land uses and building square footage as the proposed Project. In addition, mobile emissions would not incorporate certain VMT reductions from the Project's TA and the TDM trip reductions.

c) Project Design Features

Refer to Project Design Feature WS-PDF-1 (Water Conservation Features) in Section IV.N.2, *Water Supply*, of this Draft EIR. Project Design Feature WS-PDF-1 includes water conservation features that reduce operational GHG emissions.

The following Project Design Feature related to GHG emissions will also be implemented as part of the Project:

> **GHG-PDF-1: Green Building Features.** The Project will achieve the USGBC LEED Gold Certification and will be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code

and the City of Los Angeles Green Building Code. A summary of key green building and LEED measures are provided below:

- The Project will incorporate heat island reduction strategies for 50 percent of the Project Site hardscapes or provide 100 percent structured parking and incorporate heat island reduction strategies for the Project roof areas.
- The Project will promote alternatives to conventionally fueled automobiles by designating a minimum of 8 percent of on-site non-residential parking for carpool and/or alternative-fueled vehicles and shall pre-wire, or install conduit and panel capacity for a minimum of 30 percent of the Code-required parking spaces, with 10 percent of the Code-required spaces further improved with electric vehicle charging stations.
- The Project will optimize building energy performance with a 20 percent reduction from the LEED Version 4 (v4) baseline consistent with LEED requirements (equivalent to approximately 11.6 percent reduction from the 2016 Title 24 standards).[113,114,115]
- The Project will reduce water consumption by 40 percent for indoor water and 100 percent for outdoor water from the LEED v4 usage baseline. The reductions would be achieved through potential strategies such as the installation of water efficient fixtures that exceed applicable standards and water efficient landscaping.[116]

d) Analysis of Project Impacts

Threshold (a): Would the Project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or

113 United States Department of Energy, ANSI/ASHRAE/IES Standard 90.1-2013 Determination of Energy Savings: Quantitative Analysis, 2014.

114 Energy Star, The Difference Between Source and Site Energy, https://www.energystar.gov/buildings/facility-owners-and-managers/existing-buildings/use-portfolio-manager/understand-metrics/difference, accessed February 27, 2020.

115 The Project's building energy optimization credit through GHG-PDF-1 represents a larger reduction than compliance with the 2019 Title 24 Standards, where electricity would be reduced by approximately 2% and natural gas would be reduced by approximately 5% as compared to 2016 Title 24 Standards. Therefore, the Project would be consistent with and better than the 2019 Title 24 Standards through GHG-PDF-1. Refer to: California Energy Commission, Impact Analysis, 2019 Update to the California Energy Efficiency Standards for Residential and Non-Residential Buildings, Section 1.2 (Non-Residential), Table 19 (Multi-Family without PV), June 10, 2018, accessed February 27, 2020.

116 Project water demand values were taken from LADWP's Water Supply Assessment – Hollywood Center Project, November 2018, that incorporate water reductions and savings due to City of Los Angeles Ordinance No. 180,822 and No. 184,248 that go beyond the LEED usage baseline. Therefore, as a conservative assessment, additional reductions due to LEED commitments were not incorporated into Project water use demand for GHG emissions modeling.

Threshold (b): Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

(1) Impact Analysis

(a) Project Consistency with Applicable Plans and Policies

As mentioned above, in the absence of any adopted quantitative threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations and requirements adopted for the purpose of reducing the emissions of GHGs. The consistency of the Project or the Project with the East Site Hotel Option to applicable GHG plans, policies and regulations would be essentially the same. Thus, the consistency analysis below applies to the Project or the Project with the East Site Hotel Option.

As described above, compliance with a GHG emissions reduction plan renders a less-than-significant impact. The analyses below demonstrate that the Project is consistent with the applicable GHG emission reduction plans and policies included within the 2017 Climate Change Scoping Plan, the SCAG 2016-2040 RTP/SCS, the City of L.A.'s Green New Deal (Sustainable City pLAn 2019), and Los Angeles Green Building Code. As shown herein, the Project would be consistent with the applicable GHG reduction plans and policies.

(i) CARB's Climate Change Scoping Plan

At the State level, Executive Orders S-3-05 and B-30-15 are orders from the State's Executive Branch for the purpose of reducing GHG emissions. Executive Order S-3-05's goal to reduce GHG emissions to 1990 levels by 2020 was adopted by the Legislature as the 2006 Global Warming Solutions Act (i.e., AB 32) and codified into law in HSC Division 25.5. Executive Order B-30-15's goal to reduce GHG emissions to 40 percent below 1990 levels by 2030 was adopted by the Legislature in SB 32 and also codified into law in HSC Division 25.5.

In support of AB 32 and SB 32, the State has promulgated specific laws and strategies aimed at GHG reductions that are applicable to the Project. The primary focus of many of the Statewide and regional plans, policies, and regulations is to address worldwide climate change. Due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, there is no basis for concluding that the Project's increase in annual GHG emissions would cause a measurable change in global GHG emissions necessary to influence global climate change. Newer construction materials and practices, energy efficiency requirements, and newer appliances tend to emit lower levels of air pollutant emissions, including GHGs, as compared to those built years ago; however, the net effect is difficult to quantify. The GHG emissions of the Project alone would not likely cause a direct physical change in the environment. According to

CAPCOA, "GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective."[117] It is global GHG emissions in their aggregate that contribute to climate change, not any single source of GHG emissions alone.

The Climate Change Scoping Plan outlines a framework that relies on a broad array of GHG reduction actions, which include direct regulations, alternative compliance mechanisms, incentives, voluntary actions, and market-based mechanisms such as the Cap-and-Trade program. The Climate Change Scoping Plan builds off of a wide array of regulatory requirements that have been promulgated to reduce statewide GHG emissions, particularly from energy demand and mobile sources. While these regulatory requirements are not targeted at specific land use development projects, they would indirectly reduce a development project's GHG emissions. A discussion of these regulatory requirements that would reduce the Project's GHG emissions are provided below.

- **California Renewables Portfolio Standard (RPS) program (SB 100):** While this action does not directly apply to individual projects, the Project complies with the RPS program inasmuch as its electricity provided by LADWP, which, in compliance with the RPS program, is required to obtain 33 percent renewable power by 2020 and has committed to achieving 50 percent renewables by 2025.[118] Furthermore, per the updated requirements of SB 100, signed by Governor Brown on September 10, 2018, LADWP would be required to procure eligible renewable electricity for 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030 and should plan to achieve 100 percent eligible renewable energy resources and zero-carbon resources by December 31, 2045. Thus, the Project would be supplied with electricity via renewable sources at increasing rates over time reducing the Project's electricity-related GHG emissions.
- **SB 1368/AB 398, CCR Title 20, Cap-and-Trade Program:** The State's Cap-and-Trade Program reduces GHG emissions from major sources (deemed "covered entities") by setting a firm cap on Statewide GHG emissions and employing market mechanisms to achieve emission reduction targets. While the Cap-and-Trade Program does not directly apply to individual projects, the Project would comply with the Program inasmuch as the Project's electricity usage would be covered by the Cap-and-Trade Program as LADWP is a covered entity, resulting in a reduction of GHG emissions from the Project's energy consumption.
- **AB 1493 (Pavley Regulations):** The State's Pavley Regulations apply to new passenger vehicles from model year 2012 through 2016 (Phase I) and model years 2017–2025 (Phase II). While this action does not apply to individual projects, future residents, employees, and visitors to the Project Site would purchase new vehicles in compliance with this regulation. Mobile source emissions generated by future residents, employees, and visitors to the Project Site would be reduced with

117 CAPCOA, CEQA & Climate change: Evaluating and Addressing Greenhous Gas Emissions from Projects Subject to the California Environmental Quality Act, 2008.

118 LADWP, 2017 Power Strategic Integrated Long-Term Resource Plan, p. ES-18.

implementation of AB 1493. However, it is noted that the vehicle emissions standards beyond model year 2020 may not occur if the Federal SAFE Vehicles Rules and the One National Program on Federal Preemption of State Fuel Economy Standards are upheld by the Courts.

- **Advanced Clean Cars Program:** The Advanced Clean Cars (ACC) program includes Low-Emission Vehicle (LEV) regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the Zero-Emission Vehicle (ZEV) regulation, which requires manufacturers to produce an increasing number of pure ZEVs (meaning battery electric and fuel cell electric vehicles), with provisions to also produce plug-in hybrid electric vehicles (PHEV) in the 2018 through 2025 model years. While this action does not directly apply to individual projects, the standards would apply to all vehicles purchased or used by residents, employees, and visitors to the Project Site. The Project would designate a minimum of 8 percent of on-site non-residential parking for carpool and/or alternative-fueled vehicles. In addition, the Project design provides for the installation of the conduit and panel capacity to accommodate future electric vehicle charging stations into a minimum of 30 percent of the parking spaces, with 10 percent of the Code-required spaces further improved with electric vehicle charging stations. As such, the Project would support compliance with this regulation.
- **Low Carbon Fuel Standard (Executive Order S-01-07):** This regulation establishes a Statewide goal to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020 and 18 percent by 2030. While this action does not directly apply to individual projects, future residents, employees, and visitors to the Project Site would utilize transportation fuels in compliance with this regulation. GHG emissions related to vehicular travel by Project would benefit from this regulation and mobile source emissions generated by future residents, employees, and visitors to the Project Site would be reduced with implementation of the LCFS.
- **SB 375:** SB 375 establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions. Under SB 375, CARB is required, in consultation with the State's Metropolitan Planning Organizations, to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035. While this action does not directly apply to individual projects, the Project would be consistent with SCAG 2016-2040 RTP/SCS goals and objectives under SB 375 to implement "smart growth." As discussed below in Subsection IV.E.3.d)(1)(b), *Greenhouse Gas Emissions*, the Project would be consistent with the SCAG 2016-2040 RTP/SCS.
- **SB X7-7:** The Water Conservation Act of 2009 sets an overall goal of reducing per capita urban water use by 20 percent by December 31, 2020. Each urban retail water supplier shall develop water use targets to meet this goal. While this action does not directly apply to individual projects, the Project would support compliance with this regulation by implementing Project Design Features GHG-PDF-1 and WS-PDF-1.
- **California Integrated Waste Management Act (IWMA) of 1989 and AB 341:** The IWMA mandated that State agencies develop and implement an integrated waste management plan which outlines the steps to be taken to divert at least 50 percent of

their solid waste from disposal facilities. AB 341 directs CalRecycle to develop and adopt regulations for mandatory commercial recycling and sets a Statewide goal for 75 percent disposal reduction by the year 2020. While this action does not directly apply to individual projects, the Project would comply with the IWMA inasmuch as it would be served by a solid waste collection and recycling service that include mixed waste processing, and that yields waste diversion results comparable to source separation and consistent with Citywide recycling targets. According to the City of Los Angeles Zero Waste Progress Report (March 2013), the City achieved a landfill diversion rate of approximately 76 percent by year 2012.[119]

Table IV.E-3, *Consistency with Applicable Climate Change Scoping Plan Greenhouse Gas Reduction Strategies*, contains a list of GHG-reducing strategies applicable to the Project. The analysis describes the Project's compliance and consistency with these strategies outlined in the State's Climate Change Scoping Plan to reduce GHG emissions. As discussed below, the Project would implement Project Design Features and incorporate characteristics to reduce energy use, conserve water, reduce waste generation, and reduce vehicle travel consistent with Statewide strategies and regulations. As a result, the Project would not conflict with applicable Climate Change Scoping Plan strategies and regulations to reduce GHG emissions.

TABLE IV.E-3
CONSISTENCY WITH APPLICABLE CLIMATE CHANGE SCOPING PLAN GREENHOUSE GAS REDUCTION STRATEGIES

Actions and Strategies	Responsible Party	Compliance/Consistency Analysis
Energy		
CCR, Title 24. Energy Efficiency Standards for Residential and Nonresidential Buildings	State, Local Jurisdictions	**Compliant.** The Project would meet or exceed the applicable requirements of the Title 24 Building Energy Efficiency Standards and CALGreen Code or applicable version at the time of building permit issuance. The Project would incorporate energy efficient measures as part of meeting the LEED Gold Certification level or equivalent green building standard. The Project would also incorporate energy efficiency measures as outlined in Project Design Feature GHG-PDF-1 and Project Design Feature WS-PDF-1.

[119] City of Los Angeles Department of Public Works, LA Sanitation, Zero Waste Progress Report, March 2013.

TABLE IV.E-3
CONSISTENCY WITH APPLICABLE CLIMATE CHANGE SCOPING PLAN GREENHOUSE GAS REDUCTION STRATEGIES

Actions and Strategies	Responsible Party	Compliance/Consistency Analysis
California Green Building Standards Code Requirements. Heating, ventilation, and air conditioning (HVAC) Systems will be designed to meet American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) standards.	State, Local Jurisdictions	**Compliant.** The Project would utilize energy efficiency appliances and equipment and would meet the applicable energy standards in the Title 24 Building Energy Efficiency Standards and CALGreen Code, or applicable version at the time of building permit issuance and would install ENERGY STAR compliant appliances, including ENERGY STAR compliant bathroom fans. The Project would utilize energy efficiency HVAC Systems that would meet or exceed the applicable energy standards in ASHRAE Appendix G and the Title 24 Building Energy Efficiency Standards and CALGreen Code, or applicable version of these standards at the time of building permit issuance.
Energy commissioning shall be performed for buildings larger than 10,000 square feet.	State, Local Jurisdictions	**Compliant.** The Project would meet this requirement as part of its compliance with the City's requirements and LEED Gold Certification Requirements or equivalent.
Refrigerants used in newly installed HVAC systems shall not contain any CFCs.	State, Local Jurisdictions	**Compliant.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code for the use of HFCs in HVAC systems.
Parking spaces shall be designed for carpool or alternative fueled vehicles. Up to eight percent of total parking spaces will be designed for such vehicles.	State, Local Jurisdictions	**Compliant.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code. The Project would designate a minimum of eight percent of on-site, non-residential parking for carpool and/or alternative-fueled vehicles (approximately 122 spaces). In addition, the Project design provides for the installation of the conduit and panel capacity to accommodate future electric vehicle charging stations into a minimum of 30 percent of the parking spaces (approximately 457 spaces), with 10 percent of the Code-required spaces further improved with electric vehicle charging stations (approximately 153 spaces).

TABLE IV.E-3
CONSISTENCY WITH APPLICABLE CLIMATE CHANGE SCOPING PLAN GREENHOUSE GAS REDUCTION STRATEGIES

Actions and Strategies	Responsible Party	Compliance/Consistency Analysis
Long-term and short-term bike parking shall be provided for up to 5 percent of vehicle trips.	State, Local Jurisdictions	**Compliant.** The Project would meet this requirement by providing up to 551 bicycle parking spaces, and up to 554 bicycle parking spaces under the Project with the East Site Hotel Option, as part of its compliance with the City's requirements and the CALGreen Code.
Stormwater Pollution Prevention Plan (SWPPP) required.	State, Local Jurisdictions	**Compliant.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code (See Section IV.G, *Hydrology and Water Quality*, of this Draft EIR).
Indoor water usage must be reduced by 20 percent compared to current California Building Code Standards for maximum flow.	State, Local Jurisdictions	**Compliant.** The Project would meet this requirement, pursuant to Project Design Feature GHG-PDF-1, as part of its compliance with the City's requirements, the CALGreen Code, and meeting the LEED Gold Certification level or equivalent green building standard. As part of Project Design Feature WS-PDF-1, the Project would provide water efficiency features for indoor water usage that include use of ENERGY STAR Certified clothes washers and dishwashers and high-efficiency toilets.
All irrigation controllers must be installed with weather sensing or soil moisture sensors.	State, Local Jurisdictions	**Compliant.** The automatic irrigation system that would be installed as part of the Project would include irrigation controls that would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
Wastewater generation shall be reduced by 20 percent compared to current California Building Standards.	State, Local Jurisdictions	**Compliant.** The Project would meet this requirement, pursuant to Project Design Feature GHG-PDF-1, as part of its compliance with the City's requirements, the CALGreen Code, and meeting the LEED Gold Certification level or equivalent green building standard. As part of Project Design Feature WS-PDF-1, the Project would provide water efficiency features for indoor water usage that include use of ENERGY STAR Certified clothes washers and dishwashers and high-efficiency toilets that would reduce water usage and have a corresponding reduction in wastewater generation.

TABLE IV.E-3
CONSISTENCY WITH APPLICABLE CLIMATE CHANGE SCOPING PLAN GREENHOUSE GAS REDUCTION STRATEGIES

Actions and Strategies	Responsible Party	Compliance/Consistency Analysis
Requires a minimum of 50 percent recycle or reuse of nonhazardous construction and demolition debris.	State, Local Jurisdictions	**Compliant.** The Project would meet or exceed this requirement as part of its compliance with the City's requirements and the CALGreen Code.
Requires documentation of types of waste recycled, diverted or reused.	State, Local Jurisdictions	**Compliant.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
Water		
CCR, Title 24. Title 24 includes water efficiency requirements for new residential and non-residential uses.	State, Local Jurisdictions	**Compliant.** See discussion under Title 24 Building Standards Code and California Green Building Standards Code Requirements above.
Other Sources		
Climate Action Team. Reduce diesel-fueled commercial motor vehicle idling.	State, CARB.	**Compliant.** The Project would comply with the CARB Air Toxics Control Measure to limit heavy duty diesel motor vehicle idling to no more than 5 minutes at any given time. This would also be applicable to the Project without Reduction Features scenario since the underlying Airborne Toxic Control Measure (ATCM) that limits heavy-duty diesel motor vehicle idling (Title 13 California Code of Regulations [CCR], Section 2485) was adopted by CARB in 2004.
Plant five million trees in urban areas by 2020 to effect climate change emission reductions.	Local Jurisdictions	**Consistent.** While this action does not directly apply to individual projects, the Project would provide approximately 203 net new trees in landscaping on the Project Site compared to the existing conditions.
Implement efficient water management practices and incentives, as saving water saves energy and GHG emissions.	State, Local Jurisdictions	**Compliant.** The Project would meet this requirement, pursuant to Project Design Feature GHG-PDF-1, as part of its compliance with the City's requirements, the CALGreen Code, and meeting the LEED Gold Certification level or equivalent green building standard.

TABLE IV.E-3
CONSISTENCY WITH APPLICABLE CLIMATE CHANGE SCOPING PLAN GREENHOUSE GAS REDUCTION STRATEGIES

Actions and Strategies	Responsible Party	Compliance/Consistency Analysis
Reduce GHG emissions from electricity by reducing energy demand. The California Energy Commission updates appliance energy efficiency standards that apply to electrical devices or equipment sold in California. Recent policies have established specific goals for updating the standards; new standards are currently in development.	State, Local Jurisdictions	**Compliant.** While this action does not directly apply to individual projects, the Project would be compliant by utilizing or installing appliances, electrical devices, and/or equipment that meet the standards for such appliances, electrical devices, and/or equipment sold in California.
Apply strategies that integrate transportation and land-use decisions, including but not limited to promoting jobs/housing proximity, high-density residential/commercial development along transit corridors and implementing intelligent transportation systems.	State, CARB, SCAG	**Consistent.** The Project would incorporate physical and operational Project characteristics that would reduce vehicle trips and VMT and encourage alternative modes of transportation for guests and employees. The Project would reduce VMT as a result of its urban infill location, with nearby access to public transportation within 0.25-mile of the Project Site, and its proximity to other destinations including off-site residential, retail, and entertainment (refer to discussion of VMT-reducing Project land use characteristics in Subsection IV.E.3.d)(1), *Impact Analysis*.)
Reduce energy use in private buildings.	State, Local Jurisdictions	**Compliant.** The Project would meet or exceed the energy standards in the Title 24 Building Energy Efficiency Standards, and the CALGreen Code. The Project would commit to reducing building energy by a minimum of 11.6 percent for new construction compared to the Title 24 Building Energy Efficiency Standards (2016), which would exceed the minimum building energy performance standards of the Los Angeles Green Building Code, as per Project Design Feature GHG-PDF-1.

SOURCE: ESA, 2020.

As described in Table IV.E-3, the Project is compliant with the applicable laws and regulations that serve to reduce GHG emissions. In addition to the Project's consistency with applicable GHG reduction laws and strategies, the Project would not conflict with the future anticipated Statewide GHG reductions goals. CARB has outlined a number of potential strategies for achieving the 2030 reduction target of 40 percent below 1990 levels, as mandated by SB 32. These potential strategies include using renewable resources for

half of the State's electricity by 2030, increasing the fuel economy of vehicles and the number of zero-emission or hybrid vehicles, reducing the rate of growth in VMT, supporting other alternative transportation options, and use of high-efficiency appliances, water heaters, and HVAC systems.[120] The Project would benefit from Statewide and utility-provider efforts towards increasing the portion of electricity provided from renewable resources. The utility provider for the Project, LADWP, currently provides 30 percent of electricity via renewable sources, but has committed to providing 50 percent by 2025, 55 percent by 2030, and 65 percent by 2036.[121,122] As these targets were determined prior to the passage of SB 100, LADWP would also be required to comply with the RPS goals as discussed above in Subsection IV.E.2.a)(2)(d), *Energy*.[123] The Project would use energy-efficient appliances and equipment (e.g., ENERGY STAR rated), water efficient fixtures, and would achieve the LEED Gold Certification level or equivalent as committed to in Project Design Feature GHG-PDF-1. The Project would also benefit from Statewide efforts towards increasing the fuel economy standards of vehicles. The Project would support reducing VMT given its location at an infill site close to existing transit options (including the Metro Red Line at the Metro Red Line Hollywood/Vine station, Metro Local Lines 180, 210, 212/312, 217, and 222, Metro Rapid Line 780, and LADOT DASH lines Hollywood, Beachwood Canyon, and Hollywood/Wilshire).

The 2017 Scoping Plan (adopted in December 2017) also outlines strategies to reduce GHG emissions to achieve the 2030 target from sectors that are not directly controlled or influenced by the Project, but nonetheless contribute to Project-related GHG emissions. For instance, the Project itself is not subject to the Cap-and-Trade regulation; however, Project-related emissions would decline pursuant to the regulation as utility providers and transportation fuel producers are subject to renewable energy standards, Cap-and-Trade, and the LCFS. The 2017 Scoping Plan also calls for the doubling of the energy efficiency savings, including utility demand-response flexibility for 10 percent of residential and commercial electric space heating, water heating, air conditioning and refrigeration. The strategy is in the process of being designed specifically to accommodate existing residential and commercial uses under the CEC's Existing Building Energy Efficiency Action Plan.[124] While CARB is in the process of expanding the regulatory framework to meet the 2030 reduction target based on the existing laws and strategies in the 2017 Scoping Plan, the Project would support or not impede implementation of these potential GHG reduction strategies identified by CARB for all the reasons summarized in Table IV.E-3.

120 Energy + Environmental Economics (E3), Summary of the California State Agencies' PATHWAYS Project: Long-Term Greenhouse Gas Reduction Scenarios, April 6, 2015.

121 CEC, Utility Annual Power Content Labels for 2017, July 2018.

122 LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, p. ES-18.

123 Note that LADWP will incorporate the targets of SB 100 into the upcoming 2018 Power Strategic Long-Term Resource Plan (see: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-renewableenergy/a-p-re-renewableenergypolicy?_afrWindowId=qgysh2515_1&_afrLoop=61924918578548&isNoLocale=true&_afrWindowMode=0&_adf.ctrl-state=qgysh2515_4).

124 CEC, 2016 Existing Buildings Energy Efficiency Plan Update, December 2016.

Even though the 2017 Scoping Plan and supporting documentation do not provide an exact regulatory and technological roadmap to achieve 2050 goals, they demonstrate that various combinations of policies could allow the Statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the study or not currently feasible at the time the 2017 Scoping Plan was adopted could enable the State to meet the 2050 targets.[125] For example, the 2017 Scoping Plan states some policies are not feasible at this time, such as Net Zero Carbon Buildings, but that this type of policy would be necessary to meet the 2050 target.

With Statewide efforts underway to facilitate the State's achievement of those goals, it is reasonable to expect the Project's GHG emissions to decline from their opening year levels as reported in Table IV.E-7 as the regulatory initiatives identified by CARB in the 2017 Scoping Plan are implemented, and other technological innovations occur. Stated differently, the Project's emissions at buildout likely represents the maximum emissions for the Project as anticipated regulatory developments and technology advances are expected to reduce emissions associated with the Project, such as emissions related to electricity use and vehicle use.

Based on the analysis above, the Project would be consistent with CARB's Scoping Plans (i.e., 2008 Scoping Plan, 2014 Scoping Plan, and 2017 Scoping Plan) and given the reasonably anticipated decline in Project emissions once fully constructed and operational, the Project would be consistent with the State's GHG reduction targets for 2030 and 2050. Therefore, impacts would be less than significant.

(ii) SCAG's 2016-2040 RTP/SCS

Transportation-related GHG emissions would be the largest source of emissions from the Project. This finding is consistent with the findings in regional plans, including the 2016-2040 RTP/SCS, which recognizes that the transportation sector is the largest contributor to the State's GHG emissions. At the regional level, the 2016-2040 RTP/SCS is an applicable plan adopted for the purpose of reducing GHGs.

The purpose of the SCAG 2016-2040 RTP/SCS is to achieve the regional per capita GHG reduction targets for the passenger vehicle and light-duty truck sector established by CARB pursuant to SB 375. SCAG's Program EIR for the 2016-2040 RTP/SCS, certified on April 7, 2016, states that "[e]ach [Metropolitan Planning Organization] is required to prepare an SCS in conjunction to [sic] with the RTP in order to meet these GHG emissions

[125] E3, Summary of the California State Agencies' PATHWAYS Project: Long-Term Greenhouse Gas Reduction Scenarios, April 6, 2015; Greenblatt, Jeffrey, "Modeling California Impacts on Greenhouse Gas Emissions," Energy Policy, Vol. 78, 2015, pp. 158-172. The CARB, CEC, California Public Utilities Commission, and the California Independent System Operator engaged E3 to evaluate the feasibility and cost of a range of potential 2030 targets along the way to the State's goal of reducing GHG emissions to 80% below 1990 levels by 2050. With input from the agencies, E3 developed scenarios that explore the potential pace at which emission reductions can be achieved as well as the mix of technologies and practices deployed. E3 conducted the analysis using its California PATHWAYS model. Enhanced specifically for this study, the model encompasses the entire California economy with detailed representations of the buildings, industry, transportation, and electricity sectors.

reduction targets by aligning transportation, land use, and housing strategies with respect to [Senate Bill] 375." [126] The 2016-2040 RTP/SCS seeks "improved mobility and accessibility… to reach desired destinations with relative ease and within a reasonable time, using reasonably available transportation choices."[127] The 2016-2040 RTP/SCS seeks to implement "strategies focused on compact infill development, superior placemaking (the process of creating public spaces that are appealing), and expanded housing and transportation choices." [128] As part of the 2016-2040 RTP/SCS, "transportation network improvements would be included, and more compact, infill, walkable and mixed-use development strategies to accommodate new region's growth would be encouraged to accommodate increases in population, households, employment, and travel demand."[129] Moreover, the 2016-2040 RTP/SCS states that while "[p]opulation and job growth would induce land use change (development projects) and increase VMT, and would result in direct and indirect GHG emissions," the 2016-2040 RTP/SCS would "supports sustainable growth through a more compact, infill, and walkable development pattern."[130]

In order to assess the Project's potential to conflict with the 2016-2040 RTP/SCS, this section analyzes the Project's land use characteristics for consistency with the strategies and policies set forth in SCAG's 2016-2040 RTP/SCS to meet GHG emission-reduction targets set by CARB. Generally, projects are considered consistent with applicable City and regional land use plans and regulations, such as SCAG's 2016-2040 RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. As discussed below, the Project would be consistent with the 2016-2040 RTP/SCS goals and benefits intended to improve mobility and access to diverse destinations, provide better "placemaking," provide more transportation choices, and reduce vehicular demand and associated emissions. Therefore, the Project would be consistent with the GHG reduction-related actions and strategies contained in the 2016-2040 RTP/SCS.

Consistent with SCAG's 2016-2040 RTP/SCS alignment of transportation, land use, and housing strategies, the Project would accommodate increases in population, households, employment, and travel demand. As discussed below, the Project Site is an infill location close to jobs, housing, shopping and entertainment uses and in close proximity to existing public transit stops, which would result in reduced VMT, as compared to a project of similar size and land uses at a location without close and walkable access to off-site destinations and public transit stops. The Project would concentrate new multi-family and senior affordable housing, and neighborhood-serving commercial retail and restaurant uses within an HQTA in an urban infill location in proximity to multiple public transit stops.

126 SCAG, Program Environmental Impact Report – 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, April 2016, p. 3.8-37.
127 SCAG, 2016-2040 RTP/SCS, April 2016, p. 160.
128 SCAG, 2016-2040 RTP/SCS, April 2016, p. 14.
129 SCAG, Program Environmental Impact Report – 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, April 2016, p. 3.8-35.
130 SCAG, Program Environmental Impact Report – 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, April 2016, p. 3.8-36.

The Project would also provide bicycle storage areas for Project residents and a ground level, wide, landscaped paseo extending east-west through the Project Site, as well as upgraded sidewalks around the perimeter of the Project Site that allow pedestrian access, which would support active transportation options and transit access, including access to the Hollywood/Vine Metro Red Line Station, which extends to Union Station and connects Downtown Los Angeles to North Hollywood. The Project is also within 0.25-miles of multiple Metro bus routes including the Metro Local Lines 180, 210, 212/312, 217, and 222, Metro Rapid Line 780, and LADOT DASH lines Hollywood, Beachwood Canyon, and Hollywood/Wilshire. The high scores for walkability and number of destinations available for non-motorized trips within the Project area indicate that the existing infrastructure and built environment is sufficiently developed such that projects located in the area would be expected to achieve substantial and credible reductions in trip distances and overall VMT.[131] The high employment density of the Hollywood Community Plan area supports the expectation that projects located in the area would provide high levels of walkability and high potential for transit usage by Project employees and visitors. Further, as discussed in the Project's TA, the Project's specific location and intense mixed-use design in close proximity to high-quality transit, including the Metro Red Line and multiple bus routes, its close proximity to other off-site retail, restaurant, entertainment, commercial, and job destinations, and its highly walkable environment support the conclusion from this analysis that the Project has been properly located so that its development would minimize VMT.[132] As such, the Project would be consistent with regional plans to reduce VMT and associated GHG emissions.

The Project would also be consistent with the following key GHG reduction strategies in SCAG's 2016-2040 RTP/SCS, which are based on changing the region's land use and travel patterns in the following key areas:

- Compact growth in areas accessible to transit;
- More multi-family housing;
- Locate jobs and housing in proximity to transit;
- Locate housing and job growth focused in HQTAs; and
- Biking and walking infrastructure to improve active transportation options and transit access.

The Project represents an infill development within an HQTA, which is defined by the 2016-2040 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 miles of a well-serviced transit stop or a transit corridor with 15-minute or less service

131 WalkScore.com (www.walkscore.com) rates the West Site (1754 Ivar Avenue, Los Angeles, CA 90028) with a score of 97 of 100 possible points and the East Site (1750 Vine Street, Los Angeles, CA 90028) with a score of 95 of 100 possible points (scores accessed October 2019). Walk Score calculates the walkability of specific addresses by taking into account the ease of living in the neighborhood with a reduced reliance on automobile travel.

132 Fehr & Peers, Transportation Assessment for the Hollywood Center Project, March 2020. Provided as Appendix N-1 of this Draft EIR.

frequency during peak commute hours.[133] As previously discussed, the Project Site is located within 0.25-miles of public transportation opportunities, including the Hollywood/Vine Metro Red Line Station and many Metro bus routes. In addition, the Project would also provide up to 551 on-site bicycle parking spaces and up to 554 on-site bicycle parking spaces under the Project with the East Site Hotel Option, consistent with the requirements of the LAMC, and would include bicycle lockers and showers for Project residents and employees. The Project would provide residents and visitors with access to public transit and opportunities for walking and biking, which would facilitate a reduction in VMT and related vehicular GHG emissions. These and other measures, including internal capture of vehicle trips from the Project's mix of uses,[134] the TDM Program and pass-by trips, would further promote a reduction in VMT and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG's 2016-2040 RTP/SCS.[135]

As described above, SCAG has established land use strategies which lead to reduced VMT. While not a regulatory document, CAPCOA has provided guidance on mitigating or reducing emissions from land use development projects within its guidance document entitled *Quantifying Greenhouse Gas Mitigation Measures* to provide a quantification tool to local governments on measures that are frequently considered as mitigation for GHG impacts. The measures presented in the CAPCOA guidance document were screened on the basis of feasibility of quantifying the emissions, the availability of meaningful and robust data upon which to base the quantification, and whether the measures (alone or in combination with other measures) would result in appreciable reductions in GHG emissions.[136] This analysis uses the CAPCOA guidance to quantify to the Project's GHG reductions to assist in determining the Project's general consistency with the strategies laid out in the 2016-2040 RTP/SCS.

The CAPCOA guidance document considers the following location settings: Urban, Compact infill, Suburban center, and Suburban. While the location of the Project Site meets the characteristics for an urban setting with respect to typical building heights of 6 stories or much higher, grid street pattern, minimal setbacks, constrained parking, high parking prices, and high quality rail service (i.e., Metro Red Line), the Project also meets the characteristics for a compact infill setting with respect to location relative to regional cores (5 to 15 miles) and jobs/housing balance (the data in the November 2018 Hollywood Community Plan Update Draft EIR, Section IV.J, *Population and Housing*, Table 4.13-6 and Table 4.13-7 shows that existing 2016 conditions and projected 2040 conditions have a jobs/housing ratio of 0.97 in 2016 and 1.05 in 2040). For the purposes of this analysis, the Project is assumed to be located in a compact infill setting. This is a highly conservative approach since the compact infill setting has lower VMT reduction caps than

133 SCAG, 2016-2040 RTP/SCS, April 2016, pp. 20, 75-77.

134 Internal capture of vehicle trips refers to trips generated by a mixed-use development that would begin and end within the development.

135 Fehr & Peers, Transportation Assessment for the Hollywood Center Project, March 2020. Provided as Appendix N-1 of this Draft EIR.

136 CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, August 2010.

the urban setting. Thus, it is possible that the Project could achieve higher levels of VMT reduction than is indicated in this assessment since the Project area meets some of the characteristics of the urban setting.

The land use characteristics of the Project listed below are consistent with and would not conflict with those shown in the CAPCOA guidance document to reduce vehicle trips to and from the Project Site as compared to the Statewide and Air Basin averages. They would, therefore, also result in corresponding reductions in VMT and associated air pollutant and GHG emissions in accordance with the CAPCOA methodologies. Detailed VMT reduction calculations using the CAPCOA methodologies are provided in Appendix E of this Draft EIR. Based on the results of these calculations, the Project would achieve an approximately 35 percent reduction in VMT from the land use characteristics discussed below. As discussed previously, the total VMT reduction taken due to the land use characteristics and the Project's TDM Program was conservatively limited to 30 percent because, while the reductions from the land use characteristics and TDM Program combined would result in VMT reductions greater than 30 percent based on CAPCOA guidance methodologies, the CAPCOA guidance document recommends using a maximum of 30 percent reductions due to Land Use/Location Transportation measures for compact/infill locations. For the purposes of this assessment, while the Project Site generally meets the definition of an urban setting, which typically achieve more than a 30 percent reduction in VMT, a maximum of 30 percent reduction in VMT is conservatively assumed in this analysis.[137]

- **CAPCOA LUT-1: Increased Density:** Increased density, measured in terms of persons, jobs, or dwelling units per unit area, reduces emissions associated with transportation as it reduces the distance people travel for work or services and provides a foundation for the implementation of other strategies such as enhanced transit services. This characteristic corresponds to CAPCOA LUT-1.[138] According to CAPCOA, the reduction in VMT from this characteristic applies to Urban and Suburban location settings for residential, retail, office, industrial, and mixed-use projects. The Project is located in a fully urbanized area and is a mixed-use development; therefore, this characteristic applies to the Project. The Project would increase the Project Site density to approximately 218 dwelling units per acre or 191 dwelling units per acre under the Project with the East Site Hotel Option (the Project Site is 4.61 acres.[139] The Project would have 872 market-rate units and 133 senior

[137] CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, August 2010, p. 162. The total VMT reduction taken due to the Project Site's land use characteristics and the Project's TDM Program was conservatively limited to 30 percent. While the reductions from the land use characteristics and TDM Program combined would result in VMT reductions greater than 30 percent, the CAPCOA guidance document recommends using a maximum of 30 percent reductions due to Land Use/Location Transportation measures for compact/infill projects. This analysis conservatively applies the 30 percent limit to this Project Site, even though the Project area meets the characteristics for an urban setting, which can achieve much higher levels of VMT reduction.

[138] CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, August 2010, pp. 155–158.

[139] This includes the post-dedication square footage that is calculated with the inclusion of the 1,267 square-foot East Site Alley Merger and the 5,163-square-foot sidewalk merger (along Yucca Street and both sides of Vine Street) area.

affordable housing and the Project with the East Site Hotel Option would have 768 market-rate units and 116 senior affordable housing units; refer to Section IV.J, *Population and Housing*, of this Draft EIR).

- **CAPCOA LUT-2: Location Efficiency:** Location efficiency describes the location of a project relative to the type of urban landscape such as an Urban area, Compact Infill, or Suburban Center. In general, compared to the Statewide average, a project could realize VMT reductions up to 65 percent in an Urban setting, up to 30 percent in a Compact Infill setting, or up to 10 percent in a Suburban Center for land use/location strategies.[140] This characteristic corresponds to CAPCOA LUT-2.[141] According to CAPCOA, the reduction in VMT from this characteristic applies to Urban and Suburban settings for residential, retail, office, industrial, and mixed-use projects. The Project is located in a fully urbanized area within an HQTA and is a mixed-use development; therefore, this characteristic applies to the Project. According to the CAPCOA guidance document, factors that contribute to VMT reductions under this characteristic include the geographic location of a project within the region. The location efficiency of the Project Site would result in synergistic benefits that would reduce vehicle trips and VMT compared to the Statewide and Air Basin averages and would result in corresponding reductions in transportation-related emissions.
- **CAPCOA LUT-3: Increased Land Use Diversity and Mixed-Uses:** Locating different types of land uses near one another can decrease VMT since trips between land use types are shorter and can be accommodated by alternative modes of transportation, such as public transit, bicycles, and walking. This characteristic corresponds to CAPCOA LUT-3.[142] According to CAPCOA, the reduction in VMT from this characteristic applies to Urban and Suburban settings (also potentially for rural master-planned communities) for mixed-use projects. The Project is located in a fully urbanized area within an HQTA and is mixed-use; therefore, this characteristic applies to the Project. According to the CAPCOA guidance document, factors that contribute to VMT reductions under this characteristic include the percentage of each land use type in the project. The Project would co-locate complementary restaurant, retail, and residential land uses. The increases in land use diversity and mix of uses on the Project Site would reduce vehicle trips and VMT by encouraging walking and non-

140 CalEEMod, by default, assumes that trip distances in the Air Basin are slightly longer than the Statewide average. This is due to the fact that commute patterns in the Air Basin involve a substantial portion of the population commuting relatively far distances, which is documented in SCAG's 2016-2040 RTP/SCS. The 2016-2040 RTP/SCS shows that, even under future Plan conditions, upwards of 52 percent of all work trips would be 10 miles or longer (SCAG, Performance Measures Appendix, p. 13). The 2016-2040 RTP/SCS does not specify the current percentage of work trips greater than 10 miles in the region, but it can be assumed that the percentage is currently greater than 52 percent since the goal of the RTP/SCS is to reduce overall per capita VMT in the region. It is thus reasonable to assume that the trip distances in Air Basin are analogous to the Statewide average given that the default model trip distances in the Air Basin are slightly longer but still generally similar to the Statewide average. Therefore, projects could achieve similar levels of VMT reduction (65 percent in an urban area, 30 percent in a compact infill area, or 10 percent for a suburban center) compared to the Air Basin average.

141 CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, August 2010, pp. 159–161.

142 CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, August 2010, pp. 162–166.

automotive forms of transportation, which would result in corresponding reductions in transportation-related emissions.

- **CAPCOA LUT-4: Increased Destination Accessibility:** This characteristic corresponds to CAPCOA LUT-4.[143] According to CAPCOA, the reduction in VMT from this characteristic applies to Urban and Suburban settings for residential, retail, office, industrial, and mixed-use projects. The Project is located in a fully urbanized area within an HQTA and is a mixed-use development; therefore, this characteristic applies to the Project. According to the CAPCOA guidance document, factors that contribute to VMT reductions under this characteristic include the distance to downtown or major job center. The Project would be located in an area that offers access to multiple other nearby destinations including restaurant, bar, office, retail, entertainment, and residential uses. The Project Site is also located near other job centers in the region and within the Hollywood Neighborhood. Ready access to multiple destinations in close proximity to the Project Site would reduce vehicle trips and VMT compared to the Statewide and Air Basin averages, encourage walking and non-automotive forms of transportation, and result in corresponding reductions in transportation-related emissions.
- **CAPCOA LUT-5: Increased Transit Accessibility:** Locating a project with high density near transit facilitates the use of transit by people traveling to or from the Project Site. This characteristic corresponds to CAPCOA LUT-5.[144] According to CAPCOA, the reduction in VMT from this characteristic applies to Urban and Suburban settings (also potentially for rural settings adjacent to a commuter rail station with convenient access to a major employment center) for residential, retail, office, industrial, and mixed-use projects. The Project is located in a fully urbanized area within an HQTA and is a mixed-use development; therefore, this characteristic applies to the Project. According to the CAPCOA guidance document, factors that contribute to VMT reductions under this characteristic include the distance to transit stations near the project. The Project would be located within 0.25-miles of public transportation, including the Metro Red Line at the Metro Red Line Hollywood/Vine station and Metro Local Lines 180, 210, 212/312, 217, and 222, Metro Rapid Line 780, and LADOT DASH lines Hollywood, Beachwood Canyon, and Hollywood/Wilshire. The Project would provide access to on-site uses from existing pedestrian pathways. The Project would also provide up to 551 on-site bicycle parking spaces, and up to 554 bicycle parking spaces under the Project with the East Site Hotel Option, consistent with the requirements of the LAMC, and would include bicycle lockers and showers, to encourage utilization of alternative modes of transportation. The increased transit accessibility would reduce vehicle trips and VMT versus the Statewide and Air Basin averages, encourage walking and non-automotive forms of transportation, and would result in corresponding reductions in transportation-related emissions.
- **CAPCOA LUT-9: Improve Design of Development:** Improved street network characteristics within a neighborhood enhances walkability and connectivity.

143 CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, August 2010, pp. 167–170.
144 CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, August 2010, pp. 171–175.

Characteristics include street accessibility usually measured in terms of number of intersections (e.g., 4-way intersections) per square mile. This measure corresponds to CAPCOA LUT-9.[145] According to CAPCOA, the reduction in VMT from this measure applies to Urban and Suburban settings for residential, retail, office, industrial, and mixed-use projects. The Project is located in an Urban infill location and is mixed-use; therefore, this measure applies to the Project. The Project would be located in a highly street-accessible area with over seventy-five four-way intersections within a 1-mile radius of the Project Site, which exceeds the standard intersection density assumed in baseline VMT modeling. The increased intersection density would reduce vehicle trips and VMT versus the Statewide and Air Basin averages, encourage walking and non-automotive forms of transportation, and would result in corresponding reductions in transportation-related emissions.

- **CAPCOA SDT-1: Provide Pedestrian Network** Improvements: Providing pedestrian access that minimizes barriers and links the Project Site with existing or planned external streets encourages people to walk instead of drive. This characteristic corresponds to CAPCOA SDT-1.146 According to CAPCOA, the reduction in VMT from this characteristic applies to Urban, Suburban, and Rural settings for residential, retail, office, industrial, and mixed-use projects. The Project is located in a fully urbanized area within an HQTA and is a mixed-use development; therefore, this characteristic applies to the Project. According to the CAPCOA guidance document, factors that contribute to VMT reductions under this characteristic include pedestrian access connectivity within the project and to/from off-site destinations. As discussed in Chapter II, Project Description, pedestrian access on the West Site would be provided from Vine Street for the main residential lobby of the West Building; from Ivar Street for the ground level lobby of the West Senior Building; and from Vine Street, Yucca Street, and Ivar Avenue for the restaurant uses on the West Site. Pedestrian access on the East Site would be provided from Vine Street for the residential lobby of the East Building; from Argyle Avenue for the ground level lobby of the East Senior Building; and from Argyle Avenue, Vine Street, and from the Project's paseo for the restaurant uses on the East Site. In addition, the Project would improve the street-level pedestrian environment and connectivity to the surrounding Hollywood Neighborhood area by avoiding new curb cuts and eliminating five curb cuts along Vine Street, which would restore sidewalk with the effect of reducing vehicle conflicts and interference with pedestrian activity along the Hollywood Walk of Fame and improve pedestrian access. In total, the Project would retain the same number of curb cuts on the West Site (two curb cuts) and the same number of curb cuts on the East Site (three curb cuts) – along Ivar Avenue, Argyle Avenue, and Yucca Street. Furthermore, the Project's pedestrian paseo and a proposed signalized crossing across Argyle Avenue would facilitate pedestrian connectivity and align with existing mid-block crosswalks on Vine Street and Ivar Avenue. Residents, visitors, patrons, and employees arriving to the Project Site by bicycle would have the same access opportunities as pedestrians and would be able to utilize on-site bicycle parking facilities.

145 CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, August 2010, pp. 182–185.
146 CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, August 2010, pp. 186–189.

By locating the Project's proposed residential uses within an area that has existing high quality public transit (with access to existing regional bus and rail service), employment opportunities, restaurants and entertainment, all within walking distance, and by including features that support and encourage pedestrian activity and other non-vehicular transportation and increased transit use in Hollywood neighborhood of Los Angeles area, the Project would reduce vehicle trips and VMT, and resulting air pollution and GHG emissions. Therefore, by developing a land use pattern that promotes sustainability, the Project's characteristics developed at its location would achieve many of the objectives of SCAG's 2016-2040 RTP/SCS.

As discussed in the above analysis and in **Table IV.E-4**, *Consistency with Applicable SCAG 2016-2040 RTP/SCS Actions and Strategies*, the Project would be consistent with and support the goals and benefits of the 2016-2040 RTP/SCS that are potentially applicable to the Project. As a result, the Project would be consistent with, and would not conflict with, applicable 2016-2040 RTP/SCS actions and strategies to reduce GHG emissions.

(i) L.A.'s Green New Deal (Sustainability pLAn 2019)

The significance of the Project's GHG emissions is next evaluated based on whether they would be generated in connection with a design that is consistent with and would not conflict with relevant City goals and actions designed to encourage development that results in the efficient use of public and private resources. One such set of goals and actions is contained in the Mayor's Green New Deal. While not a plan adopted solely to reduce GHG emissions, within L.A.'s Green New Deal (Sustainable City pLAn 2019), climate mitigation is one of eight explicit benefits that help define its strategies and goals. **Table IV.E-5**, *Comparison of Project Characteristics to Applicable City of Los Angeles Green New Deal Goals and Actions*, contains a list of GHG emission-reducing strategies applicable to the Project. The analysis describes the consistency of the Project with these GHG emissions-reduction goals and actions. As discussed in Table IV.E-5, the Project would be consistent with and would not conflict with the applicable goals and actions of these plans. In addition, as discussed below, the Project would also result in GHG reductions beyond those specified by the City and would minimize its GHG emissions by incorporating energy efficient design features and VMT reduction characteristics. Therefore, as the Project's GHG emissions would be generated in connection with a development located and designed to be consistent with the applicable City plan goals and actions for reducing GHG emissions, the Project would not conflict with these City plans adopted for the purpose of reducing GHG emissions, and the Project's GHG emissions would result in less than significant impacts.

TABLE IV.E-4
CONSISTENCY WITH APPLICABLE SCAG 2016-2040 RTP/SCS ACTIONS AND STRATEGIES

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Land Use Actions and Strategies		
Encourage the use of range-limited battery electric and other alternative fueled vehicles through policies and programs, such as, but not limited to, neighborhood oriented development, complete streets, and Electric (and other alternative fuel) Vehicle Supply Equipment in public parking lots.	Local Jurisdictions, COGs, SCAG, CTCs	**Consistent.** This action applies to local jurisdictions, COGs, SCAG and County Transportation Commissions (CTCs). While the use of alternative-fueled vehicles is beyond the direct control or influence of the Project, the Project would encourage the use of alternative-fueled vehicles by designating a minimum of 8 percent of on-site non-residential parking for carpool and/or alternative-fueled vehicles. In addition, the Project design provides for the installation of the conduit and panel capacity to accommodate future electric vehicle charging stations into a minimum of 30 percent of the parking spaces, with 10 percent of the Code-required spaces further improved with electric vehicle charging stations
Support projects, programs, and policies that support active and healthy community environments that encourage safe walking, bicycling, and physical activity by children, including, but not limited to development of complete streets, school siting policies, joint use agreements, and bicycle and pedestrian safety education.	Local Jurisdictions, SCAG	**Consistent.** While this action applies to local jurisdictions and SCAG, the Project would facilitate pedestrian and bicycle movements including through the ground level, landscaped paseo extending east-west through the Project Site, as well as, sidewalks around the perimeter of the Project Site that allow pedestrian access. Residents, visitors, patrons, and employees arriving to the Project Site by bicycle would have the same access opportunities as pedestrians and would be able to utilize on-site bicycle parking facilities, with bicycle lockers and showers. The Project would locate residential, commercial, retail, and restaurant uses within an area that has public transit, employment opportunities, restaurants and entertainment all within walking distance.
Update local zoning codes, General Plans, and other regulatory policies to promote a more balanced mix of residential, commercial, industrial, recreational and institutional uses located to provide options and to contribute to the resiliency and vitality of neighborhoods and districts.	Local Jurisdictions	**Consistent.** While this action applies to local jurisdictions, the Project would support this action/strategy by creating a mixed-use infill development comprised of complementary uses that offer employment and other community-serving opportunities. The Project would support the development of complete communities by co-locating complementary commercial/restaurant and residential land uses in close proximity to existing off-site commercial and residential uses, being located within 0.25-miles of off-site commercial and residential uses, and being located in a highly walkable area well-served by transit within 0.25-miles of the Project Site.

TABLE IV.E-4
CONSISTENCY WITH APPLICABLE SCAG 2016-2040 RTP/SCS ACTIONS AND STRATEGIES

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Support projects, programs, policies and regulations that encourage the development of complete communities, which includes a diversity of housing choices and educational opportunities, jobs for a variety of skills and education, recreation and culture, and a full-range of shopping, entertainment and services all within a relatively short distance.	Local Jurisdictions, SCAG	**Consistent.** While this action applies to local jurisdictions and SCAG, the Project would support the development of complete communities by co-locating complementary commercial and residential land uses in close proximity to existing off-site commercial and residential uses within 0.25-miles, and being located within an HQTA in a highly walkable area served by transit within 0.25-miles of the Project Site.
Pursue joint development opportunities to encourage the development of housing and-mixed use projects around existing and planned rail stations or along high-frequency bus corridors, in transit-oriented development areas, and in neighborhood-serving commercial areas.	Local Jurisdictions, CTCs	**Consistent.** While this action applies to local jurisdictions and CTCs, the Project is located within an HQTA and within 0.25-miles of the Metro Red Line Hollywood/Vine Station; multiple bus and shuttle lines; the regional freeway system; bicycle lanes; and an established pedestrian grid. Additionally, the Project would co-locate complementary commercial/restaurant and residential land uses in close proximity to existing off-site commercial and residential uses.
Create incentives for local jurisdictions and agencies that support land use policies and housing options that achieve the goals of SB 375.	State, SCAG	**Consistent.** While this action applies to the State and SCAG, the Project would be consistent with the goals of SB 375, including the goal to reduce VMT and the corresponding emission of GHGs through infill development. The Project is located within an HQTA and co-locates complementary commercial/restaurant and residential land uses in close proximity to existing off-site commercial and residential uses.[147] The Project is also located in a walkable area served by frequent and comprehensive transit within 0.25-miles of the Project Site. The increases in land use intensity and diversity and mix of uses on the Project Site would reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation, which would result in corresponding reductions in transportation-related emissions.

147 SCAG, 2016-2040 RTP/SCS, April 2016, p. 77.

TABLE IV.E-4
CONSISTENCY WITH APPLICABLE SCAG 2016-2040 RTP/SCS ACTIONS AND STRATEGIES

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Transportation Network Actions and Strategies		
Collaborate with local jurisdictions to plan and develop residential and employment development around current and planned transit stations and neighborhood commercial centers.	SCAG, CTCs, Local Jurisdictions	**Consistent.** While this action applies to local jurisdictions, SCAG and CTCs, the Project would intensify development in an area directly served by the Metro Red Line Hollywood/Vine Station. Furthermore, the Project would provide a high-density residential and commercial/restaurant use in an area with pedestrian access to a large range of entertainment and commercial uses opportunities
Encourage transit fare discounts and local vendor product and service discounts for residents and employees of TOD/HQTAs or for a jurisdiction's local residents in general who have fare media.	Local Jurisdictions	**Consistent.** While this action applies to local jurisdictions and CTCs, the Project's TDM Program (see Section IV.L, *Transportation,* of this Draft EIR for more information) would include a variety of measures that would promote transit use by residents and employees through incentives. Example strategies of the Project's TDM Program include unbundling parking for residents, carpooling incentives for commercial tenants, and shuttle services for hotels. Refer to Section IV.L, *Transportation*, of this Draft EIR, for information regarding the TDM Program.
Transportation Demand Management (TDM) Actions and Strategies		
Support work-based programs that encourage emission reduction strategies and incentivize active transportation commuting or ride-share modes.	SCAG, Local Jurisdictions	**Consistent.** While this action applies to local jurisdictions and SCAG, as part of the TDM Program, the Project would include programs that encourage emission reduction strategies, such as unbundling parking for residents, carpooling incentives for commercial tenants, and shuttle services for hotels.
Encourage the development of telecommuting programs by employers through review and revision of policies that may discourage alternative work options.	Local Jurisdictions, CTCs	**Consistent.** While this action applies to local jurisdictions and CTCs, due to the service-oriented nature of Project's commercial land uses (commercial/restaurant), telecommuting would not be feasible. However, the Project's residential units would provide occupants with appropriate connectivity within the dwelling units (e.g., wall-mounted telephone and internet connectivity ports) to provide residents with the option to obtain services that would allow for telecommuting from within their dwelling units. Thus, the Project would not impact or conflict with the City's ability to encourage telecommuting.

TABLE IV.E-4
CONSISTENCY WITH APPLICABLE SCAG 2016-2040 RTP/SCS ACTIONS AND STRATEGIES

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Clean Vehicle Technology Actions and Strategies		
Support subregional strategies to develop infrastructure and supportive land uses to accelerate fleet conversion to electric or other near zero-emission technologies. The activities committed in the two subregions (Western Riverside COG and South Bay Cities COG) are put forward as best practices that others can adopt in the future.	SCAG, Local Jurisdictions	**Consistent.** While this action applies to local jurisdictions and SCAG, as discussed above, and while directing the use of alternative-fueled vehicles is beyond the direct control or influence of the Project, the Project would encourage the use of alternative-fueled vehicles by designating a minimum of 8 percent of on-site non-residential parking for carpool and/or alternative-fueled vehicles. In addition, the Project design will provide for the installation of the conduit and panel capacity to accommodate future electric vehicle charging stations into a minimum of 30 percent of the parking spaces, with 10 percent of the Code-required spaces further improved with electric vehicle charging stations.

SOURCE: ESA, 2020.

TABLE IV.E-5
COMPARISON OF PROJECT CHARACTERISTICS TO APPLICABLE CITY OF LOS ANGELES GREEN NEW DEAL GHG EMISSIONS GOALS AND ACTIONS

Target	Project Consistency
Chapter 3: Local Water	
Reduce potable water use per capita by 22.5 percent by 2025; 25 percent by 2035; and maintain or reduce 2035 per capita water use through 2050.	While this action primarily applies to the City and LADWP and not to individual projects, the Project design incorporates water efficiency measures defined in Project Design Feature GHG-PDF-1. The Project would reduce water use by 40 percent for indoor water and 100 percent for outdoor water from the LEED usage baseline. The Project would also include water conservation features described in Project Design Feature WS-PDF-1, Water Conservation Features (refer to Section IV.N.2, *Water Supply*, of this Draft EIR for additional details)
Chapter 4: Clean and Healthy Buildings	
Reduce building energy use per square feet for all building types 22 percent by 2025; 34 percent by 2035; and 44 percent by 2050 (from a baseline of 68 mBTU/sqft in 2015).	While this action applies to City departments and not to private development, the Project is designed and would operate to meet or exceed the applicable requirements of the CALGreen Code and the Green Building Code and meet the standards of the USGBC LEED Gold Certification level or its equivalent. The Project would optimize building energy performance with a 20 percent reduction from the LEED v4 baseline consistent with LEED requirements (equivalent to approximately 11.6 percent reduction from the 2016 Title 24 standards) as described in Project Design Feature GHG-

TABLE IV.E-5
COMPARISON OF PROJECT CHARACTERISTICS TO APPLICABLE CITY OF LOS ANGELES GREEN NEW DEAL GHG EMISSIONS GOALS AND ACTIONS

Target	Project Consistency
	PDF-1. As a result, the Project would be consistent with and would not conflict with the City's action to reduce energy use.
All new buildings will be net zero carbon by 2030 and 100 percent of buildings will be net zero carbon by 2050.	The Project would comply with the State's and City's requirements that are designed to reduce GHG emissions over time, including the LA Green Building Code, Title 24, and other increasingly stringent energy conservation programs. In addition, The Project would help the City move toward a net zero carbon future.
Chapter 5: Housing & Development	
Increase cumulative new housing unit construction to 150,000 by 2025; and 275,000 units by 2035.	The Project consists of two buildout options where development of the Project would have 872 market-rate units and 133 senior affordable housing and the Project with the East Site Hotel Option would have 768 market-rate units and 116 senior affordable housing units
Ensure 57 percent of new housing units are built within 1,500 feet of transit by 2025; and 75 percent by 2035.	The Project proposes a dense mixed-use development, including housing units, on a Project Site in an urban/compact infill location within the Hollywood community of Los Angeles. The Project would be located in a highly walkable area served by frequent and comprehensive transit within 0.25-miles of the Project Site, including the Metro Red Line Hollywood/Vine Station, and within 1,500 feet of many Metro bus routes (e.g., 180, 210, 212/312, 217, 222, 780), and LADOT DASH lines Hollywood, Beachwood Canyon, and Hollywood/Wilshire, and LADOT DASH lines Hollywood, Beachwood Canyon, and Hollywood/Wilshire) and LADOT Dash Beachwood and Hollywood lines. As a result, the Project's location and design are consistent with and would not conflict with this City action.
Chapter 6: Mobility & Public Transit	
Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides or transit to at least 35 percent by 2025, 50 percent by 2035, and maintain at least 50 percent by 2050.	The Project design and location would promote walking and bicycling by providing convenient access to and from on-site uses with pedestrian access on the West Site would be provided from Vine Street for the main residential lobby of the West Building; from Ivar Street for the ground level lobby of the West Senior Building; and from Vine Street, Yucca Street, and Ivar Avenue for the restaurant uses on the West Site. Pedestrian access on the East Site would be provided from Vine Street for the residential lobby of the East Building; from Argyle Avenue for the ground level lobby of the East Senior Building; and from Argyle Avenue, Vine Street, and from the landscaped paseo for the restaurant uses on the East Site. The Project would locate residential and commercial/restaurant uses within a highly-walkable area of the Hollywood community of Los Angeles. The Project would be located in a highly walkable area served by frequent and comprehensive transit within 0.25-miles of the Project Site, including the Metro Red Line Hollywood/Vine Station, within

TABLE IV.E-5
COMPARISON OF PROJECT CHARACTERISTICS TO APPLICABLE CITY OF LOS ANGELES GREEN NEW DEAL GHG EMISSIONS GOALS AND ACTIONS

Target	Project Consistency
	1,500 feet of many Metro bus routes, and in proximity to employment opportunities, restaurants and entertainment all within walking and/or bicycling distance. The Project would provide parking for up to 551 on-site bicycle parking spacesto encourage utilization of alternative modes of transportation. As a result, the Project would be consistent with and would not conflict with this action.
Reduce VMT per capita by at least 13 percent by 2025; 39 percent by 2035; and 45 percent by 2050.	While this action applies to the City and not to individual projects, as indicated in the VMT analysis in Appendix E of this Draft EIR, the results of the analysis show that with the Project and the Project with the East Site Hotel Option, the Household VMT per capita would be 4.8 and 4.7, respectively, compared to the threshold of 6.0. Therefore, it has been concluded that the Project would not cause significant VMT impacts.
Chapter 7: Zero Emission Vehicles	
Increase the percentage of electric and zero emission vehicles in the city to 25 percent by 2025; 80 percent by 2035; and 100 percent by 2050.	While this action applies to the City and not to individual projects, the Project would encourage the use of electric vehicles by providing parking spaces capable of supporting electric vehicle supply equipment as required in Project Design Feature GHG-PDF-1 for a minimum of 30 percent of the Code-required parking spaces, with 10 percent of the Code-required spaces further improved with electric vehicle charging stations.
Chapter 9: Waste & Resource Recovery	
Increase landfill diversion rate to 90 percent by 2025; 95 percent by 2035 and 100 percent by 2050.	While this action applies to the City and not to individual projects, the Project would be served by a solid waste collection and recycling service that may include mixed waste processing, and that yields waste diversion results comparable to source separation and consistent with and would not conflict with Citywide recycling targets.
Reduce municipal solid waste generation per capita by at least 15 percent by 2030, including phasing out single-use plastics by 2028 (from a baseline of 17.85 lbs. of waste generated per capita per day in 2011).	While this action applies to the City and not to individual projects, the Project would be served by a solid waste collection and recycling service which would participate in City trash services, including separating trash from recycling through the use of blue and green recycling bins provided by the LA Sanitation Department.
Eliminate organic waste going to landfill by 2028.	The Project consists of a mixed-use development, which would participate in City trash services, including the participation in the organic waste recycling program once the Citywide residential program is implemented.

TABLE IV.E-5
COMPARISON OF PROJECT CHARACTERISTICS TO APPLICABLE CITY OF LOS ANGELES GREEN NEW DEAL GHG EMISSIONS GOALS AND ACTIONS

Target	Project Consistency
Chapter 11: Urban Ecosystems & Resilience	
Reduce urban/rural temperature differential by at least 1.7 degrees by 2025; and 3 degrees by 2035.	While this action applies to the City in general, and not specifically to individual private development, both the West and East Sites would provide a large elevated garden for residents on the respective amenity decks, outdoor amenity spaces with planting areas and canopy trees, and planting areas on the rooftop terraces for both Senior Buildings. Landscaping would be provided along the street edges and throughout the Project's open space areas, and would utilize drought-tolerant native plants. The Project with the East Site Hotel Option would provide a similar amount of trees and landscaping across the Project Site. The Project would be consistent with and would not conflict with the City's goal to reduce the heat island effect, with measures such as installing cool roofs on new buildings.
Ensure proportion of Angelenos living within 1/2 mile of a park or open space is at least 65 percent by 2025; 75 percent by 2035; and 100 percent by 2050.	The Project would include up to approximately 166,582 square feet of open space, with up to approximately 33,922 square feet of publicly accessible open space. The Project with the East Site Hotel Option would include up to approximately 150,371 square feet of open space, with up to approximately 33,922 square feet of publicly accessible open space. In addition, the Project Site has access to seven neighborhood parks, five community parks, and three regional parks located within a two-mile radius of the Project Site , (See IV.K.4, *Public Services - Parks and Recreation*, of this EIR for more information). As a result, the Project is consistent with and would not conflict with this City action.

SOURCE: City of Los Angeles, L.A.'s Green New Deal (Sustainable City pLAn 2019), 2019; ESA, 2020.

As this analysis demonstrates, the Project would be consistent with and would support goals and targets of the L.A.'s Green New Deal (Sustainable City pLAn 2019).

(ii) Los Angeles Green Building Code

As memorialized in Project Design Feature GHG-PDF-1 and Project Design Feature WS-PDF-1, the Project would comply with the Los Angeles Green Building Code to reduce GHG emissions by increasing energy-efficiency beyond requirements, reducing indoor and outdoor water demand, installing energy-efficient appliances and equipment, and complying with the 2016 California Title 24 Building Energy Efficiency Standards, as amended by the City. As per Project Design Feature GHG-PDF-1, the Project would be designed to optimize energy performance and reduce building energy cost by a minimum of 11.6 percent for new construction compared to the Title 24 Building Energy Efficiency Standards (2016), which would exceed the minimum building energy performance

standards of the Los Angeles Green Building Code. The Project would also meet the mandatory measures of the CALGreen Code as amended by the City by incorporating strategies such as low-flow toilets, low-flow faucets, low-flow showers, and other energy and resource conservation measures. The heating, ventilation, and air conditioning (HVAC) system would be sized and designed in compliance with the CALGreen Code to maximize energy efficiency caused by heat loss and heat gain. Therefore, the Project would be consistent with the Los Angeles Green Building Code.

(iii) Conclusion

In conclusion, the Project's consistency with applicable GHG reduction plans and policies plan as presented through Table IV.E-3, Table IV.E-4, and Table IV.E-5, demonstrate that the Project is consistent with regulations and policies and comply with or exceed the regulations and reduction actions/strategies outlined in the Climate Change Scoping Plan, 2016-2040 RTP/SCS, the L.A.'s Green New Deal (Sustainable City pLAn 2019), and the Los Angeles Green Building Code. **Therefore, the Project and the Project with the East Site Hotel Option would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs, and Project-specific impacts with regard to GHG emissions would be less than significant.**

(b) Greenhouse Gas Emissions

(i) Construction Emissions

Construction of the Project with the East Site Hotel Option would require similar construction activities as the Project, although at slightly reduced scale. The construction emissions calculated in the analysis below reflect the Project to provide a conservative assessment of Project construction emissions, and have been applied to the Project and the Project with the East Site Hotel Option.

The emissions of GHGs associated with construction of the Project were calculated for each year of construction activity using CalEEMod and EMFAC. As discussed above, this Draft EIR considers two potential construction scenarios where applicable: a scenario where construction of the West and East Sites have some overlap (overlapping construction scenario, with shorter overall construction duration), and a scenario where construction of the West and East Sites are entirely separate and sequential where there would be no overlap (sequential construction scenario, extended construction duration). Under the overlapping construction, the Utilities/Trenching, Site Preparation, and early Grading/Excavation phases could begin on the East Site while the West Site is in the Building Construction phase. In this overlapping construction scenario, construction could be completed in approximately 4.5 years (beginning 2021 and complete in 2025). Under the sequential construction scenario, construction of the Project would be completed over an approximately seven-year period (beginning in 2021 and complete in 2027). Assuming there is some overlap in construction activities on the West and East Sites, the Utilities/Trenching, Site Preparation, and early Grading/Excavation phases could begin

on the East Site while the West Site is in the Building Construction phase. In this overlapping construction scenario, construction could be completed in approximately 4.5 years (beginning 2021 and complete in 2025). Assuming the two sites are built one after another with no overlap, construction of the Project would be completed over an approximately seven-year period (beginning in 2021 and complete in 2027). However, in order to provide a conservative emissions analysis, for modeling purposes, construction emissions were modeled under the overlapping construction scenario beginning in 2021 and full Project buildout in 2025. This is more conservative because emission factors are higher for earlier years than later years as equipment and vehicles are anticipated to produce fewer GHG emissions over time due to more stringent requirements. Results of the GHG emissions calculations are presented on **Table IV.E-6**, *Estimated Construction Greenhouse Gas Emissions*. As presented therein, construction of the Project is anticipated to generate approximately 13,476 $MTCO_2e$. The total construction GHG emissions under the sequential construction scenario would be the same as the total construction GHG emissions shown in Table IV.E-6. Construction of the Project with the East Site Hotel Option would require similar construction activities as the Project, although at a slightly reduced scale. The emissions shown in Table IV.E-6 reflect the Project to provide a conservative assessment of Project construction emissions, and have been applied to the Project and the Project with the East Site Hotel Option.

It is estimated that 542,300 cubic yards (cy) of soil would be hauled from the Project Site during the grading and excavation phase. Emissions from haul trucks and continuous pour concrete trucks were estimated outside of CalEEMod using EMFAC emission factors for heavy-duty trucks because soil would be exported for only a portion of the days during the site preparation and grading/excavation construction phases, and the continuous concrete pour would occur for approximately 1 day for each site, so 2 days total (i.e., CalEEMod would incorrectly assume soil export and concrete import would occur every day during these phases). It should be noted that the GHG emissions shown in Table IV.E-6 are based on construction equipment operating continuously throughout the work day. In reality, construction equipment tends to operate periodically or cyclically throughout the work day. Therefore, the GHG emissions shown reflect a conservative estimate.

Although GHGs are generated during construction and are accordingly considered one-time emissions, it is important to include them when assessing all of the long-term GHG emissions associated with a project. As recommended by the SCAQMD, construction-related GHG emissions were amortized over a 30-year project lifetime in order to include these emissions as part of a project's annualized lifetime total emissions. In accordance with this methodology, the estimated Project's construction GHG emissions have been amortized over a 30-year period and are added to the annualized operational GHG emissions.

TABLE IV.E-6
ESTIMATED CONSTRUCTION GREENHOUSE GAS EMISSIONS

	$MTCO_2e$ per Year [a,b,c,d]	
	Overlapping Construction Scenario	
Construction Year	**Proposed Project (West Site Buildout) - 2024**	**Proposed Project (Full Project Buildout) – 2025**
Year 1 (2021) (West Site)	2,955	2,955
Year 2 (2022) (West Site + East Site)	1,626	4,184
Year 3 (2023) (West Site + East Site)	1,802	3,442
Year 4 (2024) (West Site + East Site)	363	2,161
Year 5 (2025) (East Site)	–	734
Total	**6,746**	**13,476**
Amortized Emissions (30-years)	**225**	**449**

[a] Totals may not add up exactly due to rounding in the modeling calculations.

[b] CO_2e emissions are calculated using the global warming potential values from IPCC, Fourth Assessment Report: 25 for CH_4 and 298 for N_2O (IPCC, Fourth Assessment Report: The Physical Science Basis, Summary for Policy Makers, 2007).

[c] In order to provide a conservative emissions analysis, for modeling purposes, construction GHG emissions were modeled under the overlapping construction scenario beginning in 2021 and full Project buildout in 2025. This is more conservative because emission factors are higher for earlier years than later years as equipment and vehicles are anticipated to produce fewer GHG emissions over time due to more stringent requirements.

[d] Emissions differ from the analysis conducted for the Environmental Leadership Development Project (ELDP) certification for the following reasons: Project construction schedule was further refined after ELDP publication, on-road mobile source emissions for the Draft EIR utilize the EMFAC2017 model, which was approved by the USEPA in 2019, which occurred after ELDP certification.

SOURCE: ESA, 2020.

Due to the potential persistence of GHGs in the environment, impacts are based on annual emissions and, in accordance with SCAQMD methodology, construction-period impacts are not assessed independent of operational-period impacts, which are discussed in the next section.[148]

(ii) Operational Emissions

During operation, the Project and the Project with the East Site Hotel Option would result in different GHG emissions primarily as a result of slight differences in VMT and building energy demand. Thus, GHG calculations are provided for both the Project and the Project with the East Site Hotel Option. GHG emissions associated with operation of the Project were estimated using the CalEEMod model. The Project is designed to include green building techniques and other sustainability features, which were factored into the quantitative analysis. The Project must comply with the portions of Los Angeles Green Building Code applicable to mixed-use/commercial development. Additionally, physical

148 SCAQMD, Greenhouse Gas CEQA Significance Threshold Stakeholder Working Group #12, July 29, 2009.

and operational Project characteristics for which sufficient data is available to quantify the reductions from building energy and resource consumption have been included in the quantitative analysis. Such characteristics include: water efficient fixtures and irrigation, and optimizing building energy usage with an 11.6 percent reduction from the 2016 California Title 24 Building Energy Efficiency Standards.[149]

As explained above, the Project's mobile source emission calculations associated with the Project are calculated using the VMT from the TA prepared by Fehr & Peers for the Project.[150] The trip lengths are based on the location and urbanization of the project area. The average trip length of each land use is the sum of the trip length of each trip type multiplied by the percentage of trip type. The Project's mobile source emissions are calculated based on the Project's VMT obtained from the Project's TA,[151] which accounts for Project related reductions in trip generation and VMT due to the Project's infill nature, location, design, and TDM Program (refer to Section IV.L, *Transportation*, of this Draft EIR, for a discussion of the transportation demand management features).

As discussed above, the Project Site's land use characteristics and the Project's Transportation Assessment[152] demonstrate that the Project's VMT would be reduced compared to a standard non-infill project and based on its location efficiency and incorporation of the Project's TDM Program. The total VMT reduction taken due to the land use characteristics and the Project's TDM Program was conservatively limited to 30 percent because while the reductions from the land use characteristics and TDM Program combined would result in VMT reductions greater than 30 percent based on CAPCOA guidance methodologies, the CAPCOA guidance document recommends using a maximum of 30 percent reductions due to Land Use/Location Transportation measures for compact/infill projects such as the proposed Project.[153]

Maximum annual GHG emissions resulting from motor vehicles, energy (i.e., electricity and natural gas), water conveyance and wastewater treatment, and solid waste were calculated for the expected opening year of the West Site (2024) and full Project buildout (2025 or 2027). The maximum opening year GHG emissions from operation of the Project and the Project with the East Site Hotel Option are shown in **Table IV.E-7**, *Project Annual Greenhouse Gas Emissions*.

149 The Project's building energy optimization credit through GHG-PDF-1 represents a larger reduction than compliance with the 2019 Title 24 Standards, where electricity would be reduced by approximately 2% and natural gas would be reduced by approximately 5% as compared to 2016 Title 24 Standards. Therefore, the Project would be consistent with and better than the 2019 Title 24 Standards through GHG-PDF-1. Refer to: California Energy Commission, Impact Analysis, 2019 Update to the California Energy Efficiency Standards for Residential and Non-Residential Buildings, Section 1.2 (Non-Residential), Table 19 (Multi-Family without PV), June 10, 2018, accessed February 27, 2020.

150 Fehr & Peers, Transportation Assessment for the Hollywood Center Project, March 2020. Provided as Appendix N-1 of this Draft EIR.

151 Fehr & Peers, Transportation Assessment for the Hollywood Center Project, March 2020. Provided as Appendix N-1 of this Draft EIR.

152 Fehr & Peers, Transportation Assessment for the Hollywood Center Project, March 2020. Provided as Appendix N-1 of this Draft EIR.

153 CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, August 2010, p. 162.

TABLE IV.E-7
ANNUAL GREENHOUSE GAS EMISSIONS

Emissions Sources	Project CO2e (Metric Tons per Year) [a,b]									
			Project Built under the Overlapping Construction Scenario (Year 2025) [c]				Project Built under the Sequential Construction Scenario (Year 2027) [c]			
	Project – West Site Buildout- Project without Reduction Features Scenario (Year 2024)	Project – West Site Buildout (Year 2024)	Project Buildout – Project without Reduction Features Scenario	Project Buildout	Project with the East Site Hotel Option Buildout – Project without Reduction Features Scenario	Project with the East Site Hotel Option Buildout	Project Buildout – Project without Reduction Features Scenario	Project Buildout	Project with the East Site Hotel Option Buildout – Project without Reduction Features Scenario	Project with the East Site Hotel Option Buildout
Proposed Project Operational										
On-Road Mobile Sources	2,151	1,505	4,471	3,130	5,280	3,696	4,254	2,978	5,025	3,517
Cooling Tower	34	9	82	12	84	18	82	11	84	16
Area (Landscaping + Stationary Generator)	48	48	96	96	94	94	96	96	94	94
Electricity	1,613	1,298	3,089	2,491	3,204	2,579	3,083	2,226	3,198	2,306
Natural Gas	443	423	928	888	1,044	990	928	888	1,044	990
Water Conveyance and Wastewater Treatment	181	118	362	238	387	260	362	221	387	241
Solid Waste	130	130	272	272	252	252	272	272	252	252
Construction (Amortized)	225	225	449	449	449	449	449	449	449	449
Proposed Subtotal	**4,825**	**3,757**	**9,750**	**7,575**	**10,795**	**8,339**	**9,527**	**7,141**	**10,534**	**7,867**
Percent Reduction (Operational Total)	**—**	**22%**	**—**	**22%**	**—**	**23%**	**—**	**25%**	**—**	**25%**

TABLE IV.E-7
ANNUAL GREENHOUSE GAS EMISSIONS

Emissions Sources	Project CO2e (Metric Tons per Year) [a,b]									
			Project Built under the Overlapping Construction Scenario (Year 2025) [c]				Project Built under the Sequential Construction Scenario (Year 2027) [c]			
	Project – West Site Buildout- Project without Reduction Features Scenario (Year 2024)	Project – West Site Buildout (Year 2024)	Project Buildout – Project without Reduction Features Scenario	Project Buildout	Project with the East Site Hotel Option Buildout – Project without Reduction Features Scenario	Project with the East Site Hotel Option Buildout	Project Buildout – Project without Reduction Features Scenario	Project Buildout	Project with the East Site Hotel Option Buildout – Project without Reduction Features Scenario	Project with the East Site Hotel Option Buildout

[a] Totals may not add up exactly due to rounding in the modeling calculations. Because the West Site would be completed first in year 2024 and operational before completion of the East Site, operational GHG emissions for the West Site in year 2024 were analyzed and presented in this analysis. In addition, operational GHG emissions for buildout of both the West Site and East Site in year 2025 (i.e., buildout under the overlapping construction scenario) and year 2027 (i.e., buildout under the sequential construction scenario) were analyzed and presented in this analysis.

[b] CO2e emissions are calculated using the global warming potential values from the Intergovernmental Panel on Climate Change Fourth Assessment Report. Emissions differ from the analysis conducted for the Environmental Leadership Development Project (ELDP) certification for the following reasons: Project construction and operational schedule and development details were further refined after ELDP publication, on-road mobile source emissions for the Draft EIR utilize the City's VMT Calculator Tool which provides more accurate VMT estimates for locations in the City as compared to the methodology used in the ELDP analysis and the EMFAC2017 model, which was approved by the USEPA in 2019.

[c] As described above, in order to provide a conservative emissions analysis, for modeling purposes, construction GHG emissions were modeled under the overlapping construction scenario beginning in 2021 and full Project buildout in 2025 for all Project buildout scenarios. This scenario is more conservative because emission factors are higher for earlier years than later years as equipment and vehicles are anticipated to produce fewer GHG emissions over time due to more stringent requirements. In addition, as recommended by the SCAQMD, construction-related GHG emissions were amortized over a 30-year project lifetime in order to include these emissions as part of a project's annualized lifetime total emissions.

SOURCE: ESA, 2020.

As discussed previously, State, regional, and local GHG reduction plans and policies, such as CARB's Climate Change Scoping Plan, 2016-2040 RTP/SCS, and L.A.'s Green New Deal would be applicable to the Project. These plans and policies are intended to reduce GHG emissions in accordance with the goals of AB 32. In order to evaluate the efficacy of the GHG reduction characteristics, features, and measures that would be implemented as part of the Project as required by these GHG reduction plans and policies, this analysis compares the Project's GHG emissions to the emissions that would be generated by the Project without implementation of GHG reduction characteristics, features, and measures. This comparison is provided to evaluate the Project's efficiency with respect to GHG emissions but is not the threshold of significance used for impact analysis. The analysis assumes the Project without implementation of GHG reduction characteristics, features, and measures would incorporate the same land uses and building square footage as the Project, and does not include certain VMT reductions from the Project's Transportation Assessment and land use characteristics, such as increased destination accessibility and increased transit ability, or reductions resulting from the Project's TDM program.

While other methodologies for calculating Project GHG reduction efficiencies exist, a comparison of Project GHG reduction efforts compared to a Project without Reduction Features scenario provides valuable information regarding the efficiency of the Project's GHG reduction features and is presented here for informational purposes only. This analysis compares the Project's GHG emissions to the emissions that would be generated by the Project in the absence of any GHG reduction features. It is not a threshold of significance, and is not used as the basis for any significance finding. Furthermore, this analysis is consistent with the most current regulatory policies and GHG quantification methods, however the scientific, regulatory environment regarding GHG reduction, and CEQA approaches for GHG analysis are constantly evolving and will continue to do so into the future.

The quantification of GHG emissions that would be generated by the Project without implementation of GHG reduction characteristics, features, and measures is based on specific and defined circumstances in the context of relevant State activities and mandates. The GHG emissions for the Project without Reduction Features scenario is evaluated based on the specific and defined circumstances that CARB relied on when it projected the State's GHG emissions in the absence of GHG reduction measures in the 2014 Scoping Plan and 2017 Scoping Plan. The defined circumstances used by CARB include conditions that existed during 2009 to 2011, which include the vehicle fleet that existed during that same period and the 2008 Title 24 Building Energy Efficiency Standards. Furthermore, the specific Project Site characteristics and Project Design Features such as GHG-PDF-1 (Green Building Features and WS-PDF-1 (Water Conservation Features, refer to Section IV.N.2, *Water Supply*, of this Draft EIR) were not included as part of the calculations using the CalEEMod tool as they encompass GHG reduction strategies and features that would be consistent with State, regional, and local GHG reduction plans and policies or would go above and beyond regulatory requirements (for complete list of assumptions refer to Appendix E of this Draft EIR).

When considering only the Project's emissions, Table IV.E-7 shows that the Project's operational emissions of 3,757 $MTCO_2e$ in 2024 with completion of the West Site would be approximately 22 percent below the emissions that would be generated by the Project without implementation of GHG reduction characteristics, features, and measures. The Project's operational emissions in 2025 of 7,575 $MTCO_2e$ with completion of the East Site (i.e., buildout) would be approximately 22 percent below the emissions that would be generated by the Project without implementation of GHG reduction characteristics, features, and measures. Under the Project with the East Site Hotel Option, operational emissions in 2025 of 8,339 $MTCO_2e$ would be approximately 23 percent below the emissions that would be generated by the Project with the East Site Hotel Option without implementation of GHG reduction characteristics, features, and measures. The Project's operational emissions in 2027 of 7,141 $MTCO_2e$ with completion of the East Site (i.e., buildout) would be approximately 25 percent below the emissions that would be generated by the Project without implementation of GHG reduction characteristics, features, and measures. Under the Project with the East Site Hotel Option, operational emissions in 2027 of 7,867 $MTCO_2e$ would be approximately 25 percent below the emissions that would be generated by the Project with the East Site Hotel Option without implementation of GHG reduction characteristics, features, and measures. Thus, this analysis quantitatively demonstrates the efficiency of the Project GHG reduction measures as set forth in the applicable GHG reduction plans and policies. The 22, 22, 23, 25 and 25 percent reductions, respectively, in emissions, based on the different Project scenarios across operational years 2024, 2025 and 2027 is due to the following primary factors:

- **Reduction in vehicle trips and VMT associated with the Project's land use characteristics.** As discussed above, based on the Project's TA and the CAPCOA guidance document, Project related reductions in trip generation and VMT are expected due to the Project's infill nature, location, design, and TDM Program. For the West Site, for both the Project and the Project with the East Site Hotel Option, these characteristics account for approximately a 30 percent reduction in VMT and an approximately 13 percent reduction in total West Site GHG emissions in the first operational year of 2024. Under the overlapping construction scenario, for buildout of the Project, these characteristics account for approximately a 30 percent reduction in VMT and an approximately 14 percent reduction in total Project GHG emissions in the first operational year of 2025. Under the overlapping construction scenario, for buildout of the Project with the East Site Hotel Option, these characteristics account for approximately a 30 percent reduction in VMT and an approximately 15 percent reduction in total Project GHG emissions in the first operational year of 2025. Under the sequential construction scenario, for buildout of the Project, these characteristics account for approximately a 30 percent reduction in VMT and an approximately 13 percent reduction in total Project GHG emissions in the first operational year of 2027. Under the sequential construction scenario, for buildout of the Project with the East Site Hotel Option, these characteristics account for approximately a 30 percent reduction in VMT and an approximately 14 percent reduction in total Project GHG emissions in the first operational year of 2027.

- **Water conservation features.** As discussed under Subsection IV.E.3.c), *Project Design Features*, the Project would reduce water consumption by 40 percent for indoor water and 100 percent for outdoor water from the LEED usage baseline.[154] The reductions would be achieved through potential strategies such as the installation of water efficient fixtures that exceed applicable standards and water efficient landscaping (refer to Section IV.N.2*, Water Supply*, of this Draft EIR). Based on the water demand values were from LADWP's Water Supply Assessment, for the West Site, for both the Project and the Project with the East Site Hotel Option, the water conservation features would account for an approximately 35 percent reduction in water conveyance and wastewater treatment source emissions, and an approximately 1 percent reduction in West Site GHG emissions in the first operational year of 2024. Under the overlapping construction scenario, for buildout of the Project, these features would account for approximately a 34 percent reduction in water conveyance and wastewater treatment source emissions, and an approximately 1 percent reduction in total Project GHG emissions in the first operational year of 2025. Under the overlapping construction scenario, for buildout of the Project with the East Site Hotel Option, these features account for approximately a 33 percent reduction in water conveyance and wastewater treatment source emissions and an approximately 1 percent reduction in total Project GHG emissions in the first operational year of 2025. Under the sequential construction scenario, for buildout of the Project, these features account for approximately a 39 percent reduction in water conveyance and wastewater treatment source emissions and an approximately 1 percent reduction in total Project GHG emissions in the first operational year of 2027. Under the sequential construction scenario, for buildout of the Project with the East Site Hotel Option, these features account for approximately a 38 percent reduction in water conveyance and wastewater treatment source emissions and an approximately 1 percent reduction in total Project GHG emissions in the first operational year of 2027.
- **Optimize Building Energy Performance and Lower carbon intensity of electricity.** As discussed under Subsection IV.E.3.c), *Project Design Features*, above, the Project will optimize building energy performance with a 20 percent reduction from the LEED baseline consistent with LEED requirements (equivalent to approximately 11.6 percent reduction from the 2016 Title 24 standards). In addition, under the Renewables Portfolio Standard, LADWP is required to reduce the carbon intensity of their electricity. The carbon intensity of LADWP electricity is 595 lbs/MWh for the Project without implementation of GHG reduction characteristics, features, and measures scenario. As discussed above, the future year CO_2 emission factors of 497 lbs/MWh, used for years 2024 and 2025, and 444 lbs/MWh, used for year 2027, were scaled proportionately based on the future year renewable energy targets of 44 percent by 2024 and at least 50 percent by 2027, refer to Appendix E of the AQ/GHG

[154] Project water demand values were taken from LADWP's Water Supply Assessment – Hollywood Center Project, November 2018, that incorporate water reductions and savings due to City of Los Angeles Ordinance No. 180822 and No. 184248 that go beyond the LEED usage baseline. Therefore, as a conservative assessment, additional reductions due to LEED commitments were not incorporated into Project water use demand for GHG emissions modeling.

Technical Appendix for additional details).[155, 156] For the West Site, for both the Project and the Project with the East Site Hotel Option, these features account for approximately a 20 percent reduction in electricity emissions and an approximately 7 percent reduction in total West Site GHG emissions in the first operational year of 2024. Under the overlapping construction scenario, for buildout of the Project, these features account for approximately a 19 percent reduction in electricity emissions and an approximately 6 percent reduction in total Project GHG emissions in the first operational year of 2025. Under the overlapping construction scenario, for buildout of the Project with the East Site Hotel Option, these features account for approximately a 20 percent reduction in electricity emissions and an approximately 6 percent reduction in total Project GHG emissions in the first operational year of 2025. Under the sequential construction scenario, for buildout of the Project, these features account for approximately a 28 percent reduction in electricity emissions and an approximately 9 percent reduction in total Project GHG emissions in the first operational year of 2027. Under the sequential construction scenario, for buildout of the Project with the East Site Hotel Option, these features account for approximately a 28 percent reduction in electricity emissions and an approximately 8 percent reduction in total Project GHG emissions in the first operational year of 2027.

(iii) Post Buildout Emissions

Executive Orders S-3-05 and B-30-25 establish a goal to reduce GHG emissions to 80 percent below 1990 levels by 2050. This goal has not been codified by the Legislature and CARB has not adopted a strategy or regulations to meet the 2050 goal. However, studies have shown that, in order to meet the 2050 goal, aggressive technologies in the transportation and energy sectors, including electrification and the decarbonization of fuel, will be required. In its original 2008 Scoping Plan, CARB acknowledged that the "measures needed to meet the 2050 goal are too far in the future to define in detail."[157] In the 2014 Scoping Plan, CARB generally described the type of activities required to achieve the 2050 target: "energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and rapid market penetration of efficiency and clean energy technologies that requires significant efforts to deploy and scale markets for the cleanest technologies immediately."[158] The 2017 Scoping Plan recognizes that additional work is needed to achieve the more stringent 2050 target: "While the Scoping Plan charts the path to achieving the 2030 GHG emissions reduction target, we also need momentum to propel us to the 2050 Statewide GHG target (80 percent below 1990 levels). In developing this Scoping Plan, we considered what policies are needed to meet our mid-term and long-term goals."[159] For example, the 2017 Scoping

155 LADWP, 2016 Briefing Book, 2016.
156 CEC, Utility Energy Supply Plans from 2015, LADWP modified December 6, 2016, http://www.energy.ca.gov/almanac/electricity_data/s-2_supply_forms_2015/, accessed February 27, 2020.
157 CARB, Climate Change Scoping Plan, December 2008, p. 117.
158 CARB, First Update to the AB 32 Scoping Plan, May 2014, p. 32.
159 CARB, California's 2017 Climate Change Scoping Plan, November 2017.

Plan acknowledges that "though Zero Net Carbon Buildings are not feasible at this time and more work needs to be done in this area, they will be necessary to achieve the 2050 target. To that end, work must begin now to review and evaluate research in this area, establish a planning horizon for targets, and identify implementation mechanisms."[160]

- **Energy Sector:** Continued improvements in California's lighting, appliance, and building energy efficiency programs and initiatives, such as the State's building energy efficiency standards and zero net energy building goals, would serve to reduce the Project's emissions level.[161] Additionally, further technological improvements and additions to California's renewable resource portfolio would favorably influence the Project's emissions level.[162]
- **Transportation Sector:** Anticipated deployment of improved vehicle efficiency, zero emission technologies, lower carbon fuels, and improvement of existing transportation systems all will serve to reduce the Project's emissions level.[163]
- **Water Sector:** The Project's emissions level will be reduced as a result of further enhancements to water conservation technologies.[164]
- **Waste Management Sector:** Plans to further improve recycling, reuse, and reduction of solid waste will beneficially reduce the Project's emissions level.[165]

The AQ/GHG Technical Appendix was prepared after thorough investigation of feasible methodologies to determine the potential GHG impacts associated with the Project. Due to the technological shifts required and the unknown parameters of the regulatory framework in 2050, quantitatively analyzing the Project's impacts relative to the 2050 goal is speculative for purposes of CEQA. Despite the thorough investigation performed, due to the uncertainty regarding specific State and local actions that will be implemented to achieve the 2050 GHG emission reduction targets, calculating Project emissions levels for 2050 would be highly speculative. Nonetheless, Statewide efforts are underway to facilitate the State's achievement of those goals and it is reasonable to expect the Project's emissions level to decline as the regulatory initiatives identified by CARB in the 2017 Scoping Plan are implemented, and other technological innovations occur. Stated differently, the Project's emissions total at buildout represents the maximum emissions inventory for the Project as California's emissions sources are being regulated (and foreseeably expected to continue to be regulated in the future) in furtherance of the State's environmental policy objectives. As such, given the reasonably anticipated decline in Project emissions once fully constructed and operational, the Project would be consistent with the Executive Orders' goals.

160 CARB, California's 2017 Climate Change Scoping Plan, November 2017.
161 CARB, First Update to the AB 32 Scoping Plan, May 2014, pp. 37–39 and 85.
162 CARB, First Update to the AB 32 Scoping Plan, May 2014, pp. 40–41.
163 CARB, First Update to the AB 32 Scoping Plan, May 2014, pp. 55–56.
164 CARB, First Update to the AB 32 Scoping Plan, May 2014, p. 65.
165 CARB, First Update to the AB 32 Scoping Plan, May 2014, p. 69.

(iv) Conclusion

As set forth above, the Project would generate incrementally increased GHG emissions over existing conditions. However, even a very large individual project would not generate enough GHG emissions on its own to significantly influence global climate change. Moreover, as also discussed above, the Project would be consistent with the Climate Change Scoping Plan, 2016-2040 RTP/SCS, L.A.'s Green New Deal, and the LA Green Building Code. The Project's consistency with these applicable regulatory plans and policies to reduce GHG emissions, along with implementation of Project Design Features as discussed in this Draft EIR, particularly Project Design Feature GHG-PDF-1 (Green Building Features) in Subsection IV.E.3.c), *Project Design Features*, would reduce the Project's GHG emissions by approximately 22-25 percent (depending on the Project buildout scenario). In summary, the plan consistency analysis provided above demonstrates that the Project's design features are consistent with regulations and policies and comply with or exceed the regulations and reduction actions/strategies outlined in the Climate Change Scoping Plan, 2016-2040 RTP/SCS, L.A.'s Green New Deal, and the LA Green Building Code. **Therefore, the Project and the Project with the East Site Hotel Option would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs, and Project-specific impacts with regard to GHG emissions and climate change would be less than significant. Moreover, as the Executive Director of CARB has determined that the Project would not result in any additional emission of GHGs (see Subsection IV.E.4, *Jobs and Economic Improvement Through Environmental Leadership Act*, below for details), the Project would clearly not result in a significant impact with regard to GHG emissions.**

(2) Mitigation Measures

Impacts regarding GHG emissions and conflicts with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding GHG emissions and conflicts with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

As analyzed above, the Project and the Project with the East Site Hotel Option would have slight differences in quantified GHG emissions. However, despite the variance in the quantified GHG emissions, the consistency of the Project or the Project with the East Site Hotel Option to applicable GHG plans, policies and regulations would be essentially the same. Thus, the conclusions regarding the cumulative impact analysis, impact

significance and mitigation measures presented below are the same and apply to the Project or the Project with the East Site Hotel Option.

(1) Impact Analysis

Although the Project is expected to emit GHGs, the emission of GHGs by a single project into the atmosphere is not itself necessarily an adverse environmental effect. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change. The resultant consequences of that climate change can cause adverse environmental effects. A project's GHG emissions typically would be very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. The State has mandated a goal of reducing Statewide emissions to 1990 levels by 2020 and reducing Statewide emissions to 40 percent below 1990 levels by 2030, even though Statewide population and commerce are predicted to continue to expand. In order to achieve this goal, CARB is in the process of establishing and implementing regulations to reduce Statewide GHG emissions. Currently, there are no applicable CARB, SCAQMD, or City of Los Angeles significance thresholds or specific reduction targets, and no approved policy or guidance to assist in determining significance at the project or cumulative levels. Additionally, there is currently no generally accepted methodology to determine whether GHG emissions associated with a specific project represent new emissions or existing, displaced emissions. Therefore, consistent with CEQA Guidelines Section 15064h(3),[166] the City, as lead agency, has determined that the Project's contribution to cumulative GHG emissions and global climate change would be less than significant if the Project is consistent with the applicable regulatory plans and policies to reduce GHG emissions: AB 32 Climate Change Scoping Plan, SCAG's 2016-2040 RTP/SCS, L.A.'s Green New Deal (Sustainable City pLAn 2019), and the Los Angeles Green Building Code.

Table IV.E-4 illustrates that implementation of the Project's regulatory requirements and Project Design Features, including State mandates, would contribute to GHG reductions. These reductions represent a reduction from the Project without Reduction Features scenario and support State goals for GHG emissions reduction. The methods used to establish this relative reduction are consistent with the approach used in CARB's Climate Change Scoping Plan for the implementation of AB 32.

166 As indicated above, the CEQA Guidelines were amended in response to SB 97. In particular, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction program renders a cumulative impact insignificant. Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project. To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, [and] plans or regulations for the reduction of greenhouse gas emissions."

The Project is consistent with the approach outlined in CARB's Climate Change Scoping Plan, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended by CARB's Climate Change Scoping Plan, the Project would use "green building" features as a framework for achieving GHG emissions reductions as new buildings would be designed to achieve the standards of the Gold Rating under LEED.

As part of SCAG's 2016-2040 RTP/SCS, a reduction in VMT within the region is a key component to achieving the 2020 and 2035 GHG emission reduction targets established by CARB. As discussed previously, the Project Site's land use characteristics and the Project's Transportation Assessment demonstrate that the Project's VMT would be reduced compared to a standard non-infill project and based on its location efficiency and incorporation of the Project's TDM Program.

Additionally, the Project has incorporated sustainability design features in accordance with regulatory requirements as provided throughout this Draft EIR and project design features to reduce VMT and to reduce the Project's potential impact with respect to GHG emissions. With implementation of these features, compared to the Project without Reduction Features scenario, for the West Site, for both the Project and the Project with the East Site Hotel Option, these features account for approximately a 22 percent reduction in total West Site GHG emissions in the first operational year of 2024. Compared to the Project without Reduction Features scenario, under the overlapping construction scenario, for buildout of the Project, these features account for approximately a 22 percent reduction in total Project GHG emissions in the first operational year of 2025. Compared to the Project without Reduction Features scenario, under the overlapping construction scenario, for buildout of the Project with the East Site Hotel Option, these features account for approximately a 23 percent reduction in total Project GHG emissions in the first operational year of 2025. Compared to the Project without Reduction Features scenario, under the sequential construction scenario, for buildout of the Project and the Project with the East Site Hotel Option, these features account for approximately a 25 percent reduction in total Project GHG emissions in the first operational year of 2027.

As discussed in Section IV.B, *Air Quality*, and in Section IV.H, *Land Use and Planning*, of this Draft EIR, the Project would be consistent with applicable land use policies of the City of Los Angeles and SCAG pertaining to air quality, including reducing GHG emissions.

The Project also would comply with L.A.'s Green New Deal (Sustainable City pLAn 2019), as shown in Table IV.E-5, which emphasizes improving energy conservation and energy efficiency, increasing renewable energy generation, and changing transportation and land use patterns to reduce auto dependence. The Project would also comply with the Los Angeles Green Building Code, which emphasizes improving energy conservation and energy efficiency, and increasing renewable energy generation. The Project's regulatory requirements and project design features provided above and throughout this Draft EIR would advance these objectives. Furthermore, the related projects would also be

anticipated to comply with many of these same emissions reduction goals and objectives (e.g., Los Angeles Green Building Code).

As discussed above, the Project is consistent with the applicable GHG reduction plans and policies. The comparison of the Project's emissions to a scenario without GHG reduction features demonstrates the efficacy of the measures contained in these policies. Moreover, while the Project is not directly subject to the Cap-and-Trade Program, that Program would indirectly reduce the Project's GHG emissions by regulating "covered entities" that affect the Project's GHG emissions, including energy, mobile, and construction emissions. More importantly, the Cap-and-Trade Program will backstop the GHG reduction plans and policies applicable to the Project in that the Cap-and-Trade Program will be responsible for relatively more emissions reductions if California's direct regulatory measures reduce GHG emissions less than expected. The Cap-and-Trade Program will ensure that the GHG reduction targets of AB 32 and SB 32 are met.

The 2017 Scoping Plan demonstrates that the State's existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030. Even though the 2017 Scoping Plan and supporting documentation do not provide an exact regulatory and technological roadmap to achieve the 2050 goal, they demonstrated that various combinations of policies could allow the Statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the studies could allow the State to meet the 2050 target. Subsequent to the findings of these studies, SB 32 was passed on September 8, 2016, which would require CARB to ensure that Statewide GHG are reduced to 40 percent below the 1990 emissions level by 2030. As discussed above, the new plan, outlined in SB 32, involves increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

Thus, given the Project's consistency with State, SCAG, and City GHG emission reduction goals and objectives, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given this consistency, it is concluded that the Project's impacts are not cumulatively considerable.

(2) Mitigation Measures

Cumulative impacts regarding GHG emissions were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts regarding GHG emissions were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

4. Jobs and Economic Improvement Through Environmental Leadership Act

Although not required under CEQA, the Project would voluntarily meet the requirements of the Jobs and Economic Improvement Through Environmental Leadership Act (the Act), which would allow the Project to qualify for streamlined environmental review under CEQA. The Act requires, among other things, the Project upon completion to qualify for LEED Gold Certification, be located on an infill site, and not result in any additional GHG emissions as determined by the Executive Director of CARB. As discussed previously, the Project would qualify for LEED Gold Certification and be located on an infill site. With respect to GHG emissions, the Project would not result in any additional GHGs including GHG emissions from employee transportation as a result of the purchase of emission offset credits. The Environmental Leadership Development Project certification and other related documentation are provided in Appendix B of this Draft EIR.

The Project would be built to meet and exceed today's energy and water efficiency standards and would incorporate a mix of residential, commercial, retail, and restaurant uses that would reduce vehicle trips to and from the Project Site, VMT, energy and water demand, and associated GHG emissions. The Project will incorporate GHG emission offsets as necessary to achieve a net zero increase in site GHG emissions, relative to the baseline annual GHG emissions, for the estimated Project lifetime. The Project proposes to achieve a net zero increase in site GHG emissions through Project-based or community-based program measures that would reduce GHG emissions. Examples of the types of Project-based or community-based program measures that could be considered are as follows:

- Seek opportunities for installing solar photovoltaic panels on Project building rooftops based on available physical roof space taking into account space dedicated for rooftop amenities, open space/landscaping, decks/pool areas, and space required for rooftop equipment, such as heating, ventilation, and air conditioning units.
- Purchase certified green-power from the local utility provider to offset Project-related GHG emissions from electricity demand.
- Coordinating with property owners in the City of Los Angeles or in other cities or communities in California for the installation of rooftop solar photovoltaic panels in accordance with State and local permitting standards on existing buildings, parking structures, carports, or other facilities.
- Seek opportunities for offsetting GHG emissions from existing sources in the City of Los Angeles or in other cities or communities in California or elsewhere. Examples include coordinating with local transportation agencies and property owners and establishing electric vehicle supply equipment (EVSE) at park-and-ride lots or other appropriate locations, coordinating with local transportation agencies and school districts and replacing diesel- or gasoline-fueled buses with less-polluting technologies such as compressed natural gas, electric, hybrid-electric, fuel cell, or

other commercially available technologies, implementing methane capture and destruction programs at dairy farms, or other GHG emissions offset programs.

- Seek opportunities for planting new drought-tolerant, high-carbon sequestering, and/or native trees of appropriate size and type at off-site locations such as parks in the City of Los Angeles or in other cities or communities in California or elsewhere, that would result in a net sequestration of CO_2 emissions.
- Purchase carbon credits from a reputable carbon market. Priority should be given to those credits generated within the City of Los Angeles, and in decreasing preference, credits generated within the region, in-state, and out-of-state.

Through implementation of the Project-based or community-based GHG reduction program, the Project will meet the requirement set forth in Public Resources Code Section 21183 (c), which requires that the Project demonstrate that it will not result in additional GHG emissions. The acquisition of carbon credits as part of the Project-based or community-based GHG reduction program will serve to ensure that all projected additional GHG emissions are offset. If acquiring carbon credits, the Applicant or its successor shall enter into one or more contracts to purchase carbon credits from a qualified GHG emissions broker (to be selected from an accredited registry), which contract, together with any previous contracts for the purchase of carbon credits, shall evidence the purchase of carbon credits in an amount sufficient to achieve a net zero increase in site GHG emissions. Consistent with SCAQMD's definition of the "life of the project" for CEQA GHG purposes, provided in SCAQMD's Governing Board Agenda Item 31, December 5, 2008, the Project would be required to offset emissions over a 30-year lifetime. The SCAQMD recommends that offsets should have a 30-year project life, should be real, quantifiable, verifiable, and surplus and will be considered in the following prioritized manner: (1) project design feature/on-site reduction measures; (2) off-site within the neighborhood; (3) off-site within the SCAQMD jurisdiction; (4) off-site within the State; (5) off-site out-of-State. The Project would obtain offsets following this prioritization. Thus, the Project would not result in new GHG emissions and would meet the GHG emission requirements under the Jobs and Economic Improvement Through Environmental Leadership Act for streamlined environmental review under CEQA. Detailed documentation affirming and approving the Project's consistency with the GHG emission requirements under the Jobs and Economic Improvement Through Environmental Leadership Act are available from the Office of Planning and Research at the following website: http://opr.ca.gov/ceqa/california-jobs.html.

IV. Environmental Impact Analysis

F. Hazards and Hazardous Materials

1. Introduction

This section analyzes the potential effects of the Project related to hazards and hazardous materials. Hazards addressed in this section include potential releases of hazardous materials from equipment and materials during construction, demolition, and operation; exposure to hazardous materials in buildings and other structures, soil, and groundwater; airport safety; emergency access and response plans; and wildfires. Possible hazards involving toxic air contaminant emissions and odors are discussed in Section IV.B, *Air Quality*, of this Draft EIR. The analyses are based largely on information provided in the 2018 Phase I Environmental Site Assessment[1] (Phase I ESA) and 2018 Phase II Site Investigation Report[2] (Phase II ESA), prepared by Citadel Environmental, both of which are included in Appendices H-1 and H-2 of this Draft EIR, respectively.

2. Environmental Setting

a) Regulatory Framework

(1) Hazards Materials Management

The use, storage, and disposal of hazardous materials are subject to federal, State, and local regulations as further discussed below.

The Resources Conservation and Recovery Act (RCRA) (42 U.S. Code Sections 6901-6992k) regulates the generation, transportation, treatment, storage, and disposal of hazardous waste. Under RCRA regulations, generators of hazardous waste must register and obtain a hazardous waste activity identification number. RCRA allows individual states to develop their own program for the regulation of hazardous waste as long as it is at least as stringent as RCRA. The State of California has developed the California Hazardous Waste Control Law (HWCL) (Health and Safety Code [HSC] Sections 25100 et seq. and 22 California Code of Regulations [CCR] Sections 66260.1 et seq.). The United States Environmental

[1] Citadel Environmental, Phase I Environmental Site Assessment Report, Hollywood Center Project, Los Angeles, California 90028, July 30, 2018 (Phase I ESA). Provided in Appendix H-1 of this Draft EIR.

[2] Citadel Environmental, Phase II Site Investigation Report, Hollywood Center Project, Los Angeles, California 90028, November 9, 2018, revised December 3, 2019 (Phase II ESA). Provided in Appendix H-2 of this Draft EIR.

Protection Agency (USEPA) has granted California the authority to implement RCRA regulations and has granted the California Environmental Protection Agency (CalEPA) and Department of Toxic Substances Control (DTSC) with administration responsibility and enforcement authority for implementing the HWCL.

The Federal Occupational Safety and Health Act of 1970, which is implemented by the Federal Occupational Safety and Health Administration (OSHA), contains provisions with respect to hazardous materials handling. Federal OSHA requirements, as set forth in 29 Code of Federal Regulations (CFR) Section 1910, et seq., are designed to promote worker safety, worker training, and a worker's right–to-know. The U.S. Department of Labor has delegated the authority to administer OSHA regulations to the State of California. The California OSHA program (Cal/OSHA) (codified in the CCR, Title 8 generally and in the California Labor Code Sections 6300-6719) is administered and enforced by the Division of Occupational Safety and Health (DOSH). Cal/OSHA is very similar to the Federal OSHA program. Among other provisions, Cal/OSHA requires employers to implement a comprehensive, written Injury and Illness Prevention Program (IIPP) for potential workplace hazards, including those associated with hazardous materials.

The Safe Drinking Water and Toxic Enforcement Act (22 CCR Sections 12000 et seq.), Proposition 65, lists chemicals and substances believed to have the potential to cause cancer or deleterious reproductive effects in humans, restricts the discharges of listed chemicals into known drinking water sources at levels above the regulatory levels of concern, requires public notification of any unauthorized discharge of hazardous waste, and requires that a clear and understandable warning be given prior to a known and intentional exposure to a listed substance.

At the regional level, South Coast Air Quality Management District (SCAQMD) Rule 1113 (Architectural Coatings) governs the sale of architectural coatings and limits the volatile organic compound (VOC) content in paints and paint solvents.

At the local level, the Los Angeles Fire Department (LAFD) monitors the storage of hazardous materials for compliance with local requirements. Specifically, businesses and facilities that store more than threshold quantities of hazardous materials as defined in Chapter 6.95 of the California HSC are required to file an Accidental Risk Prevention Program with the LAFD. This program includes information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations. The LAFD also issues permits for hazardous materials handling and enforces California's Hazardous Materials Release Response Plans and Inventory Law (HSC Sections 25500 et seq.). Basic requirements of California's Hazardous Materials Release Response Plans and Inventory Law include the development of detailed hazardous materials inventories used and stored on-site, a program of

employee training for hazardous materials release response, identification of emergency contacts and response procedures, and reporting of releases of hazardous materials. Any facility that meets the minimum reporting thresholds must comply with the reporting requirements and file a Business Emergency Plan (BEP) with the local administering agency (i.e., LAFD). The LAFD also administers the applicable sections of the Los Angeles City Fire Code, including Division 8, Hazardous Materials Disclosures. Those businesses that store hazardous waste or hazardous materials must submit a Certificate of Disclosure to the LAFD.

(a) Methane Gas

The City has prepared a map of methane zones and methane zone buffer areas within the City. Los Angeles Municipal Code (LAMC), Chapter IX, Article 1, Division 71, Section 91.7103, also known as the Los Angeles Methane Seepage Regulations, establishes requirements for buildings and paved areas located in areas classified as being located either in a methane zone or a methane buffer zone. Requirements for new construction within such zones include methane gas sampling to determine the Site Design Level and, depending on the detected concentrations of methane and gas pressure at the site, application of design remedies for reducing potential methane impacts. The design remedies include Methane Control Systems that are based on the Site Design Level, with more involved mitigation systems required at the higher Site Design Levels.

(b) Underground Storage Tanks

Underground storage tanks (USTs) are regulated under Subtitle I of RCRA and its regulations, which establish construction standards for new UST installations (those installed after December 22, 1988), as well as standards for upgrading existing USTs and associated piping. Since 1998, all non-conforming tanks were required to be either upgraded or closed.

The State regulates USTs pursuant to HSC Division 20, Chapter 6.7, and CCR Title 23, Division 3, Chapter 16 and Chapter 18. The State's UST program regulations include, among other provisions, permitting USTs, installation of leak detection systems and/or monitoring of USTs for leakage, UST closure requirements, release reporting/corrective action, and enforcement. Oversight of the Statewide UST program is assigned to the State Water Resources Control Board (SWRCB), which has delegated authority to the Los Angeles Regional Water Quality Control Board (LARWQCB) and typically on the local level, to the fire department (i.e., LAFD). The LAFD administers and enforces federal and State laws and local ordinances for USTs at the Project Site. Plans for the construction/installation, modification, upgrade, and removal of USTs are reviewed by LAFD Inspectors. If a release that affects groundwater is documented, the project file is transferred to the LARWQCB for oversight.

(c) Asbestos-Containing Materials (ACM)

In California, any facility known to contain ACM is required to have a written asbestos management plan (also known as an Operations and Maintenance Program [O&M Program]). Removal of ACM must be conducted in accordance with the requirements of SCAQMD Rule 1403. Rule 1403 regulations require that the following actions be taken: (1) a survey of the facility prior to issuance of a permit by SCAQMD; (2) notification of SCAQMD prior to construction activity; (3) asbestos removal in accordance with prescribed procedures; (4) placement of collected asbestos in leak-tight containers or wrapping; and (5) proper disposal.

(d) Lead and Lead-Based Paints (LBPs)

Cal/OSHA has established limits of exposure to lead contained in dusts and fumes. Specifically, CCR Title 8, Section 1532.1 establishes the rules and procedures for conducting demolition and construction activities and establishes exposure limits, exposure monitoring, and respiratory protection for workers exposed to lead.

(e) Polychlorinated Biphenyls (PCBs)

PCBs are hazardous materials that were formerly used prior to 1979 in such applications as hydraulic fluids, plasticizers, adhesives, fire retardants, etc. PCBs are regulated by the USEPA under the Toxic Substances Control Act (TSCA). These regulations ban the manufacture of PCBs although the continued use of existing PCB-containing equipment is allowed. TSCA also contains provisions controlling the continued use and disposal of existing PCB-containing equipment. The disposal of PCB wastes is also regulated by TSCA (40 CFR 761), which contains life cycle provisions similar to those in RCRA. In addition, provisions relating to PCBs are contained in the HWCL, which lists PCBs as hazardous waste.

(2) Emergency Operations Organization

The Project Site and the greater City of Los Angeles are subject to the emergency preparedness requirements of the City of Los Angeles Safety Element (Safety Element). The City of Los Angeles Emergency Management Department (EMD) leads the City's effort in the development of citywide emergency plans, revises and distributes the Emergency Operations Master Plan and Master Procedures and Annexes and updates and disseminates guidelines for the emergency response and recovery plans. The Department also reviews and tests departmental emergency plans to ensure city departments are ready to fulfill their respective emergency missions.

The Emergency Operations Organization (EOO) is the operational department of the City responsible for the City's emergency preparations (planning, training and mitigation), response, and recovery operations. The EOO comprises all agencies of the City's government, and centralizes command and information coordination.

Each City agency, in turn, has operational protocols, as well as plans and programs, to implement EOO protocols and programs.

The Emergency Operations Plan (EOP) for the City of Los Angeles addresses the City's response from small- to large-scale emergency situations associated with natural disasters or human caused emergencies. This Plan describes the methods for carrying out emergency operations, the process for rendering mutual aid, the emergency services of governmental departments and agencies, how resources are mobilized, how the public will be informed and the process to ensure continuity of government during an emergency or disaster.

A particular emergency or mitigation triggers a particular set of protocols, which are addressed by implementing plans and programs. These include hazard-specific plans (e.g., flood), situational contingency plans for known or anticipated events (e.g., annual L.A. Marathon) and pre- and post-event plans (e.g., Recovery and Reconstruction Plan). The City's emergency operations program encompasses all of these protocols, plans and programs. Therefore, its programs are not contained in one comprehensive document. The Safety Element goals, objectives and policies are broadly stated to reflect the comprehensive scope of the EOO.[3]

b) Historical Site Conditions

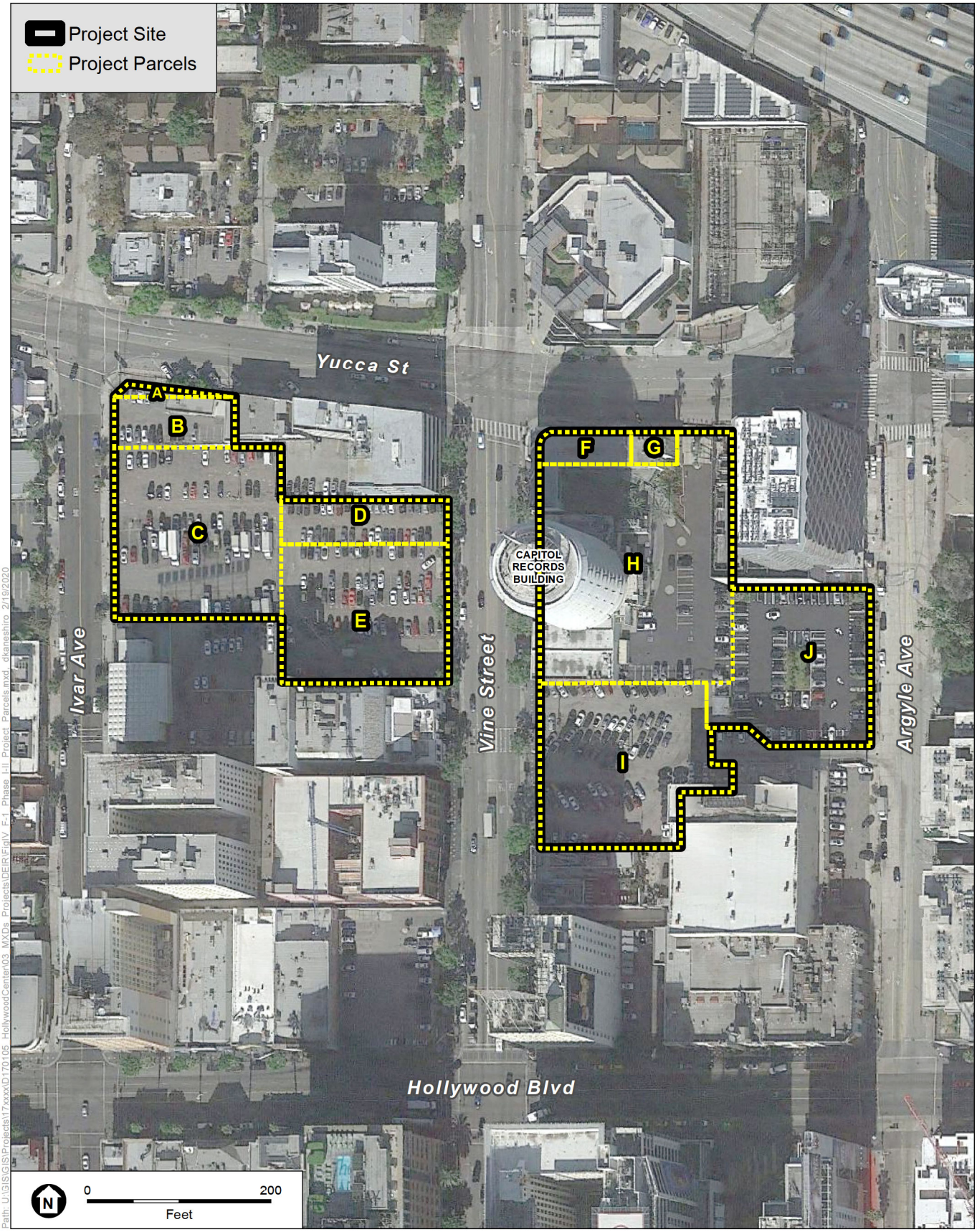
The historic conditions of the Project Site are summarized below from the Phase I ESA and Phase II ESA. These conditions are separated into the West and East Sites, where applicable, and further broken down by parcel as described in the Phase I ESA and Phase II ESA, as necessary. **Figure IV.F-1,** *Parcels Used in the Phase I ESA and Phase II ESA*, illustrates the parcels referenced in the analyses below, which include Parcels A through E on the West Site and Parcels F through J on the East Site.

(1) West Site

In the early 1900s, the West Site was developed with single-family and multi-family residential uses, which were removed over time, with the last residential uses occurring in approximately 1950.

In the northwestern portion of the West Site generally within Parcel B, a gasoline and automotive service station was operated from the early 1940s to early 1970s. The automotive-related uses on Parcel B are known to have included the use of four USTs, which were installed in 1944, including two 1,000-gallon USTs (gasoline and/or diesel fuel), one 2,000-gallon UST (gasoline and/or diesel fuel), and one 100-gallon waste-oil UST. These USTs are discussed further below.

[3] City of Los Angeles Department of City Planning, General Plan Safety Element, Exhibit H, Critical Facilities & Lifeline Systems, adopted November 26, 1996.



SOURCE: Google Earth, 2017; Citadel, 2018

Hollywood Center Project

Figure IV.F-1
Parcels Used in the Phase I ESA and Phase II ESA

In the early 1930s, a gasoline service station was operated within Parcel C. By the early 1950s, Parcel C was in use as parking lot. Any historical use of USTs associated with these automotive-related uses on Parcel C is unknown as there is no known documented/database information regarding the use or closure of associated USTs on Parcel C.

The current commercial structure on Parcel B was constructed in 1978. Beginning in 1986 until about 2012, Parcel B was used as a car rental facility. No fueling or repairs were conducted on this parcel. However, the car rental facility included a car wash, where fluids were treated through an above-ground clarifier prior to discharge to the public storm drain system.

Aside from the automotive-related uses and commercial uses on Parcels B and C, the remainder of the West Site has historically been used primarily for surface parking since the early 1950s.

(1) East Site

The East Site was developed with single and multi-family residential structures by 1907. Residential uses occurred on the East Site until the 1930s.

The Gogerty Building was constructed in the early 1930s on Parcels F and G and operated as a music and dance school from at least 1948 through 1976, in addition to supporting various commercial and office uses.

Parcels F and G were occupied with laundry and/or dry-cleaning businesses at various times including at least through the 1930s and 1940s, and in the 1990s. Based on the Phase I ESA review, it is unclear how long these facilities each operated.

The Capitol Records Building was built on Parcel H in 1956 and has continued its music-related operations since its opening.[4]

The majority of Parcels I and J have historically been used for surface parking although a small store/restaurant was located on Parcel I going back to the 1940s and was demolished in 2009. In addition, in the 1950s, portions of the parking lot on Parcel I adjacent to Vine Street were reported to have been used as a gasoline and automotive service station.[5]

4 Citadel Environmental, Phase I ESA, July 30, 2018, p. iii. Provided in Appendix H-1 of this Draft EIR.

5 Citadel Environmental, Phase I ESA, July 30, 2018, Appendix G (Langan Phase I ESA), p. 1. Provided in Appendix H-1 of this Draft EIR.

c) Existing Conditions

(1) Existing Site Improvements

(a) West Site

The West Site is currently improved with a single-story building (portions of Parcels A and B) along Yucca Street currently used by the American Musical and Drama Academy (AMDA) for sets and props storage. The remainder of the West Site is used for surface parking.

(b) East Site

The East Site is currently improved with the Capitol Records Building Complex, which includes the Capitol Records Building and adjacent Gogerty Building, along with surface parking.

(2) Potentially Hazardous Materials/Conditions on the Project Site

Based on research, testing, and monitoring conducted as part of the Phase I and Phase II ESAs, assessments are provided below as to whether any of the following three types of hazardous conditions, defined by American Society for Testing and Materials (ASTM) Standard of Practice E1527-13, occur on the Project Site:

- **Recognized Environmental Conditions (RECs):** An REC is considered to be the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. The term is not intended to include *de minimis* conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

- **Controlled Recognized Environmental Conditions (CRECs):** A CREC is a recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (e.g., as evidenced by the issuance of a no further action letter or equivalent or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (e.g., property use restrictions, activity and use limitations, institutional controls, or engineering controls).

- **Historical Recognized Environmental Conditions (HRECs):** an HREC is considered to be a past release of any substances or petroleum products that

has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (e.g., property use restrictions, activities and use limitations, institutional controls, or engineering controls).

(a) Hazardous Materials Database Review

As part of the Phase I ESA, State and local regulatory agency hazardous materials databases were reviewed by Environmental Data Resources, Inc. (EDR), a hazardous materials records search company, for known or suspected contaminated sites and for sites that store, generate, or use hazardous materials on and within the vicinity of the Project Site. These databases list properties by location and provide information regarding past use and the presence of hazardous materials and/or conditions. The database search was conducted in accordance with ASTM requirements, including applicable search radius requirements (1/8 to 1 mile, depending on the database). The full report provided by EDR can be found in Appendix J of the Phase I ESA. Relevant listings applicable to the Project Site and adjacent and nearby properties are discussed below.

(i) Project Site

(a) West Site

Parcel A, located at the southwest corner of Yucca Street and Ivar Avenue, does not have an address. This parcel did not appear in the hazardous materials database review. A review of historic building permits shows that Parcel D (1755 Vine Street) had a Certificate of Occupancy for a dry cleaning facility circa 1948. However, the database review did not identify Parcel D with any known environmental concerns.

According to EDR, Parcel B (6334 Yucca Street) and Parcel C (1754 Ivar Avenue) were identified in the Historic Auto database. As discussed above, historical uses on the Project Site included automobile related uses, including a gasoline and automotive service station.

A historical gasoline service station was present at Parcel B in the 1940s to 1970s. According to LAFD records, fire permits to operate an auto fueling station were issued for Parcel B in 1944 and 1960. Four USTs were installed in 1944, including two 1,000-gallon USTs, one 2,000-gallon UST, and one 100-gallon waste-oil UST. The tanks were located along the northern boundary of Parcel B. The tanks were abandoned by removal under LAFD oversight in 1971. Building permits reviewed indicate that a gasoline service station on Parcel C was constructed in 1932, although it is not clear from the records search review when the service station operation was discontinued, which would have been some time before 1950. This is because a Certificate of Occupancy issued in 1951 indicated that the parcel was

in use as an auto park. Based on the historical nature of these operations, and that the USTs at Parcel B were abandoned under LAFD oversight, this represents a historical recognized environmental condition (HREC). Based on the historical nature of operations at Parcel C, and lack of any information regarding closure of associated USTs, this condition on Parcel C represents a REC.

While listed in the automobile database, the database review did not identify or associate the West Site with any known environmental concerns.

(b) East Site

Capitol Records, Inc. (1750 N. Vine Street as part of Parcel H) was identified on the HAZNET database for generating asbestos-containing waste in 1995, 1996, 1999, 2004, and 2005, respectively. Capitol Records, Inc. was also identified on the Facility Index System/Facility Registry System (FINDS) database, which contains facility information and "pointers" to other sources that contain more detail. The facility was identified on this database as an operator of a non-residential building. Based on a lack of reported spill, leaks, or violation, this facility is not considered to represent a significant environmental concern.

According to EDR, Parcels G and F (6270, 6272 and 6274 Yucca Street) were identified in the Historic Cleaner database. As discussed above, historical uses on the East Site included dry cleaning operations. However, while listed in the Historical Cleaner database, the database review did not identify or associate the East Site with any known environmental concerns.

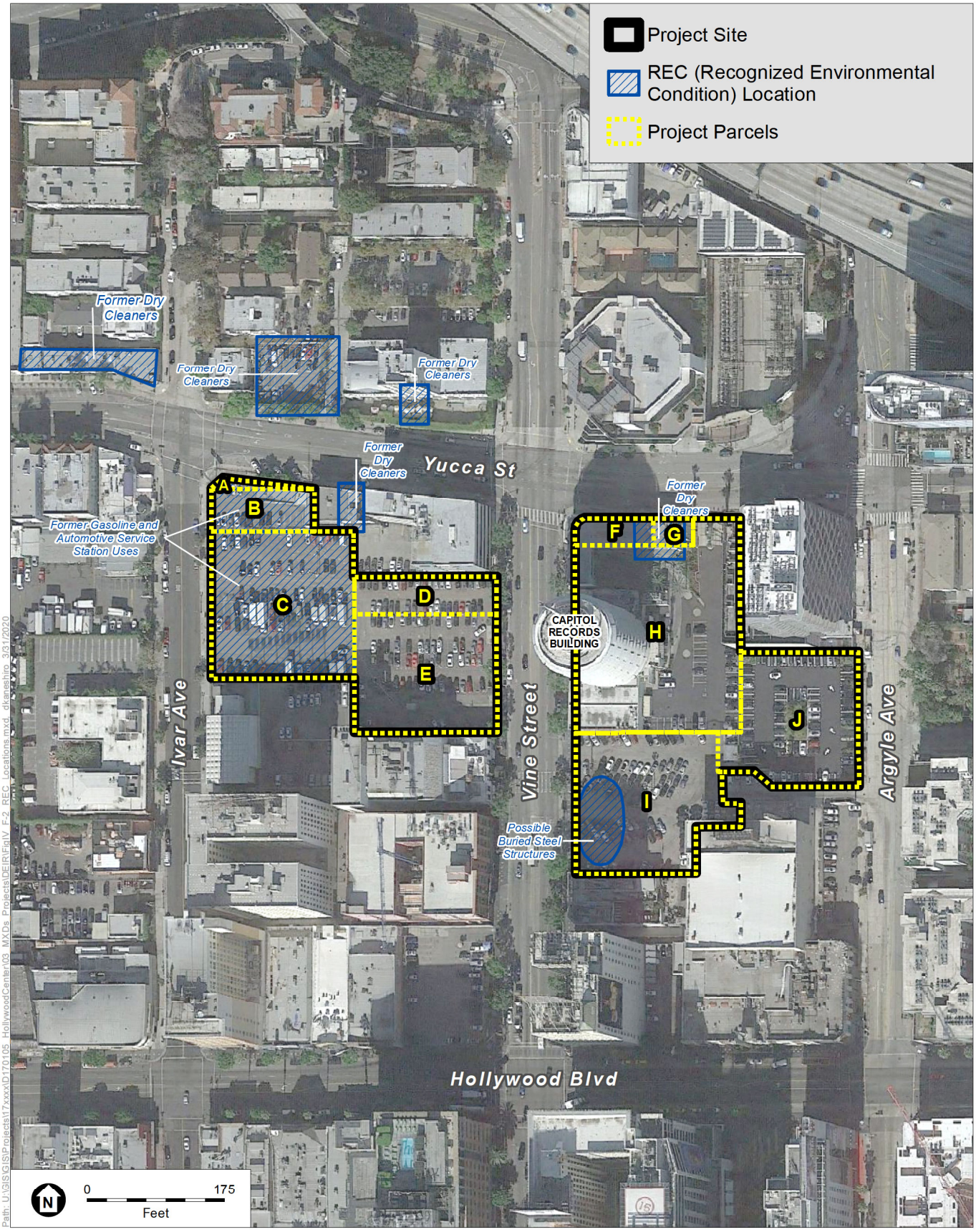
The EDR database review did not identify Parcels I and J as known or suspected contaminated sites; or sites that store, generate, or use hazardous materials.

(ii) Off-Site Adjacent and Nearby Properties

The records search indicated seven former dry cleaners were operated nearby and adjacent to the West Site between 1933 and 1970. The former dry cleaner properties along Yucca Street were identified within 0.125-mile (or a 200-foot radius) and upgradient of the Project Site on the Historical Dry Cleaners database. The locations of the dry cleaners are shown on **Figure IV.F-2**, *Locations of RECs Based on Phase I ESA and Phase II ESA*.[6]

While these sites are listed in the Historical Cleaner database, the database review did not identify any known environmental concerns associated with these adjacent properties. Nonetheless, dry cleaning facilities typically use dry cleaning solvents, which are hazardous materials, if the dry cleaning is conducted onsite. Per the

6 Citadel Environmental, Phase II ESA, November 9, 2018, revised December 3, 2019, p. 16. Provided in Appendix H-2 of this Draft EIR.



SOURCE: Google Earth, 2017; Citadel, 2018

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Figure IV.F-2
Location of RECs Based on Phase I ESA and Phase II ESA

Phase I ESA, it is unknown whether these previous dry cleaners resulted in the release of dry cleaning solvents to the underlying soil or groundwater and, if so, whether the solvents migrated to the soil and groundwater beneath the Project Site. Accordingly, the Phase I ESA concluded that due to the proximity to the Project Site and that solvents were likely to have been used at these properties, a vapor encroachment condition (VEC) concern cannot be ruled out and represents a REC. The Phase I ESA recommended conducting a soil vapor survey to assess the potential subsurface impacts from the historic dry-cleaning operations on the Project Site and in the vicinity. Subsequently, the Phase II ESA was conducted, which included taking numerous subsurface soils samples and testing for VOCs to determine if solvents or solvent vapors are currently present beneath the Project Site from the former dry cleaning operations, as well as the historic automobile-related uses on the Project Site. The results of the Phase II ESA analysis are presented under the "Subsurface Soil and Soil Gas Contamination" subsection.

(b) Field Reconnaissance Results

As part of the Phase I ESA, a field reconnaissance was conducted and consisted of an inspection of the Project Site and a perimeter survey of the surrounding properties.

(i) West Site

Wells, Cisterns, Sumps, and Drains. Storm drains were observed in the parking area at Parcel B. No hazardous substances or petroleum products were noted near these drains. Based on the use of the drains solely for surface water runoff, the presence of the drains does not represent a significant environmental concern.

Wastewater or Grease Interceptors. An aboveground clarifier/water filtration unit was observed inside the carport at Parcel B. The clarifier is not currently in use. No stains or leaks were observed near the clarifier, and it does not represent a significant environmental concern.

No significant environmental concerns were observed on Parcels, A, C, D and E.

Overall, no hazardous materials were observed on the West Site which would present a significant environmental concern.

(ii) East Site

Aboveground Storage Tanks (ASTs). On the East Site, two ASTs associated with a fire pump and emergency generator with a capacity of 160 gallons and 100 gallons, respectively, were observed within the Capitol Records Building (Parcel H). No spills, staining, or leaks were observed by the ASTs. Based on the conditions observed, the ASTs do not represent a significant environmental concern.

Storage Drums. One 55-gallon drum each of corrosive liquid, pesticide, and biocide 4080 were observed in the gas meter room in the Capitol Records Building (Parcel H), with no signs of leaks or spills. Based on the conditions observed, the drums do not represent a significant environmental concern.

Radioactive Man-Made Materials. As with many public and private office buildings in the United States, the Capitol Records Building (Parcel H) and Gogerty Building (Parcels F, G and H) may have self-luminescent tritium exit signs that contain radioactive materials. However, these do not constitute a REC and would not be handled or disposed of or otherwise disturbed by the Project. As such, these are not further evaluated below.

Wells, Cisterns, Sumps, and Drains. Storm drains were observed in the parking area at the Capitol Records Building (Parcel H). No hazardous substances or petroleum products were noted near these drains. Based on the use of the drains solely for surface water runoff, the presence of the drains does not represent a significant environmental concern.

Other. One compressed nitrogen cylinder and one helium cylinder were observed in the mastering room on the second floor in the Capitol Records Building (Parcel H); the storage and handling of these cylinders does not represent a significant environmental concern.

No significant environmental concerns were observed on Parcels I and J.

Overall, no hazardous materials were observed on the East Site which would present a significant environmental concern.

(iii) Adjacent and Nearby Properties

No hazardous materials were observed as part of the field reconnaissance on adjacent or nearby properties that would present a significant environmental concern to the Project Site.

(c) USTs

(i) West Site

Parcel B – As discussed above, former automotive-related uses on Parcel B included four USTs that were installed in 1944 along the northern boundary of Parcel B and were removed under LAFD oversight in 1971.[7] Because these tanks

[7] Citadel Environmental, Phase I ESA, July 30, 2018, p. iii. Provided in Appendix H-1 of this Draft EIR.

were removed under LAFD oversight, this represents a HREC, and no further investigation of these former tanks is warranted.

Additionally, a previously unidentified approximate 150-gallon UST was encountered on the border of Parcels B and C during a fault investigation conducted at the Project Site in October and November 2018.[8] The UST appeared to be a small, homemade, single-wall UST with two connection ports, one of which was open. However, no staining or odors were noted, no holes or corrosion were observed, and a photoionization detector did not detect any readings of VOCs or hydrocarbons above background levels. The UST was successfully removed on April 2, 2019, under the supervision of the LAFD. All associated waste materials were transported for off-site disposal in accordance to federal and State regulations. On October 10, 2019, the LAFD issued a "no further action" letter indicating no further actions are necessary and closure of this case by LAFD.[9] As this UST has been removed and no further action has issued by LAFD, no further analysis is needed, and no environmental concern is associated with this former UST.

Parcel C – As discussed above, Parcel C included historic automotive-related uses, which may have included USTs. Due to the lack of information on historic USTs that may have been installed on Parcel C, this is considered a REC.

Also, during a prior Phase I ESA conducted by BA Environmental in 2007 for 1749 N. Vine Street, which included Parcels C, D, and E, two concrete pads, covered with asphalt, were observed in the southwestern portion of Parcel C adjacent to Ivar Avenue and appeared to be the location of two former gasoline fueling pumps. What appeared to be a fill port for a UST was observed in the west-central portion of Parcel C adjacent to Ivar Avenue. This suspect fill port was observed to be filled with sand.

A 2007 Phase II subsurface investigation conducted by BA Environmental following the Phase I ESA on Parcel C included a geophysical survey that indicated at least one possible UST is located in Parcel C. Other broader subsurface structures were identified in the geophysical survey in various areas of Parcel C that were determined to be metal objects that could be possible tank-like structures, however, they are not believed to be associated automotive fueling activities based on Sanborn maps review. Soil samples were taken from 15 shallow soil borings in various areas of Parcel C as having potential subsurface metal structures based on the geophysical survey. The soil samples were tested

8 Group Delta, Status of UST Removal Memorandum, June 19, 2019. Provided in Appendix H-3 of this Draft EIR.

9 Los Angeles Fire Department, Fire Chief, Ralph M. Terrazas, and Royce Long, CUPA Manager, Letter Regarding 1770 Ivar, LLC, 6334 Yucca Street, Los Angeles California, dated October 10, 2019. Provided in Appendix H-3 of this Draft EIR.

and analyzed for total petroleum hydrocarbons (TPH), fuel oxygenates, and VOCs. The laboratory results did not detect the presence of any elevated levels TPH, fuel oxygenates, or VOCs. The 2007 Phase II subsurface investigation concluded that no further investigation was needed but did recommend further investigation and removal of the possible UST and any other metal structures during future redevelopment activities.[10]

No evidence of USTs was observed on Parcels A and E.

(ii) East Site

Parcel I - As discussed in the Phase I ESA, a 2007 Phase II subsurface investigation of this parcel conducted by BA Environmental revealed evidence of a subsurface steel structure approximately four to five feet bgs.[11] Soil and soil vapor samples taken in 2007 were collected from locations adjacent to the geophysical anomalies and analyzed for TPH and VOCs. The laboratory results did not detect the presence of TPH or VOCs above their respective detection limits. The 2007 Phase II subsurface investigation concluded that no further subsurface investigations were needed but did recommend further investigation and removal of the possible underground steel structure during future redevelopment activities.[12] The general location of the steel structure is illustrated on Figure IV.F-2.

No evidence of USTs was observed on Parcels F, G, H and J.

(d) Subsurface Soil and Soil Gas Contamination

As discussed above, the hazardous materials database review revealed that historical dry-cleaning facilities were present on Parcels F and G at various point in time dating back to the 1930s. Also, several historic dry-cleaning facilities were once present in the Project vicinity north of Yucca Street and within 200 feet and hydraulically upgradient of the Project Site. Since these operations were conducted prior to regulations for using chlorinated solvents as part of the dry-cleaning operations, and because the duration of these operations are not all known, these former facilities were identified in the Phase I ESA as RECs and having potential for VECs to occur on the Project Site.

Also, as discussed above, historic gas stations and automotive-related uses are known to occur within specific areas of the Project Site, while many areas of the Project Site were also identified as automobile parking areas, which potentially could also have been used for automobile fueling and maintenance.

[10] Citadel Environmental, Phase II ESA, November 9, 2018, revised December 3, 2019, p. 18. Provided in Appendix H-2 of this Draft EIR.
[11] Citadel Environmental, Phase I ESA, July 30, 2018. Provided in Appendix H-1 of this Draft EIR.
[12] Citadel Environmental, Phase I ESA, July 30, 2018, p. 16. Provided in Appendix H-1 of this Draft EIR.

Primarily due to the historic on-site and proximate dry-cleaning facilities, as well as the historic automobile-related uses on the Project Site, a Phase II ESA was conducted, which included a soil vapor investigation to evaluate for the potential presence of VOCs due to historical Site operations. The investigation was intended to determine if historical operations at the various parcels at the Project Site and upgradient of the Project Site have impacted the subsurface by means of evaluating the current subsurface conditions and determining if solvents or solvent vapors are currently present. Soil borings were advanced in Parcels B, C, D, E, H, I and J to evaluate subsurface conditions.[13] Chemical concentrations are evaluated based on recommended soil vapor environmental screening levels (ESLs) for residential and commercial structures. ESLs are generic, risk-based chemical concentrations developed by the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) for use in initial screening level evaluations.[14] Refer to the Phase II ESA in Appendix H of this Draft EIR for further detailed discussions of the applicable ESLs.[15]

(i) West Site

The soil vapor test results revealed that Parcels D, and E on the West Site do not contain any subsurface solvents or VOCs above applicable residential or commercial structure screening levels. However, perchloroethylene (PCE) concentrations were reported in Parcel C (Boring B1) at levels above the recommended soil vapor ESL for residential and commercial structures. Carbon tetrachloride was also reported in Parcel B (Boring B8) at a level above the recommended soil vapor ESL for residential and commercial structures. The low levels of VOCs in soil vapor at the West Site may be indicative of a release of chlorinated hydrocarbons or gasoline compounds from the historical gasoline service stations on Parcels B and/or C, or from the historic dry cleaning facilities formerly present north of Yucca Street.

(i) East Site

The East Site does not contain any subsurface solvents or VOCs above applicable ESLs.

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[13] Citadel Environmental, Phase II ESA, November 9, 2018, revised December 3, 2019, Figure 1, Site Map. Map includes 12 boring locations. Provided in Appendix H-2 of this Draft EIR.

[14] SFBRWQCB ESLs are commonly used as for screening-level assessments in California by regulatory agencies who do not have any corresponding ESLs, such as the LARWQCB. On their website, the LARWQCB provides a link to ESLs as part of their Brownfields Cleanup and Redevelopment Agency Program here: https://www.waterboards.ca.gov/losangeles/water_issues/programs/remediation/brownfields.html, accessed March 15, 2020. The ESL reference link directs users to the SFBRWQCB ESL's Technical Document webpage here, https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/esl.html, accessed March 15, 2020.

[15] Citadel Environmental, Phase II ESA, November 9, 2018, revised December 3, 2019, revised December 3, 2019, p. 4. Provided in Appendix H-2 of this Draft EIR.

(e) LBP

The current commercial structure on Parcel B was constructed in 1978, which was the same year LBP was banned in California. Thus, it is possible that LBP is present in the building despite renovations or remodeling that has occurred over the years. Also, the date of construction of the on-site parking attendant structures was not confirmed; thus, these are conservatively concluded to potentially include LBP.

Based on the ages of the Gogerty Building and the Capitol Records Building, they also may have LBP. However, no disturbances to these buildings are proposed by the Project that could encounter LBP in these buildings.

(f) ACM

The current commercial structure on Parcel B was constructed in 1978, which was before the asbestos ban came into effect in 1989. Thus, it is possible that ACM is present in the building despite renovations or remodeling that has occurred over the years. Also, the date of construction of the on-site parking attendant structures on the West and East Sites was not confirmed, thus, these are conservatively concluded to potentially include ACM.

Based on the age of the Gogerty Building, it may have ACM. As indicated in the Phase I ESA, and discussed above, the Capitol Records Building has undergone previous ACM removal activities at various points in time since 1995. However, no disturbances to these buildings are proposed by the Project that could encounter ACM in these buildings.

(g) PCB

A potential source of PCB is the ballast contained within fluorescent lights. Fluorescent lighting could be present in the building on Parcel B, and based on the date of the original construction (1978), it is possible that PCB-containing ballasts are present. In addition, it is conservatively concluded that that PCB-containing ballasts may be located within the on-site parking attendant structures. In general, any ballast not specifically labeled as not containing PCB is presumed to contain them and requires special disposal practices when discarded.

Also, a transformer is located within a subsurface vault in the parking lot, near the east side of the Capitol Records Building. Neither the vault nor the transformer contains a “No PCB” label. Thus, it is unknown whether the oil in this transformer contains PCB. Regardless, no disturbances to this vault are proposed by the Project, and, thus, further analysis of this potential PCB source is not necessary.

(3) Schools

There are no Los Angeles Unified School District (LAUSD) elementary, middle, or high schools located within one-quarter mile of the Project Site. The nearest

LAUSD school to the Project Site is Cheremoya Avenue Elementary School (6017 Franklin Avenue), located 0.29 miles from the Project Site. The following non-LAUSD elementary, middle, or high schools are within one quarter mile of the Project:

- Hollywood Presbyterian Children's Center Preschool, 1760 North Gower Street (0.2 miles east from the Project Site)
- Montessori Shir-Hashirim Los Angeles, 6047 Carlton Way (0.25 miles southeast from the Project Site)

(4) Airports

There are no airports or airstrips located within two miles of the Project Site. The nearest airport is the Hollywood Burbank Airport (also known as the Bob Hope Airport), located about seven miles to the north of the Project Site.

(5) Emergency Preparedness

Disaster routes are transportation routes designated by the County, such as freeway, highway or arterial routes, that are pre-identified for use during times of crisis.[16] These routes are utilized to bring in emergency personnel, equipment, and supplies to impacted areas in order to save lives, protect property and minimize impact to the environment. During a disaster, these routes have priority for clearing, repairing and restoration over all other roads. The County states that "Disaster Routes are not Evacuation Routes. Although an emergency may warrant a road be used as both a disaster and evacuation route, they are completely different. An evacuation route is used to move the affected population out of an impacted area." Evacuation routes depend on the nature and location of the emergency or disaster. None of the streets within or adjacent to the Project Site are County-designated Disaster Routes.[17] The Safety Element includes a Critical Facilities & Lifeline Systems map (Exhibit H), which provides designated disaster routes within the City. The Project Site is not located along a City-selected disaster route.[18]

(6) Wildfire Hazards

The California Department of Forestry and Fire Protection (CAL FIRE) maps identify fire hazard severity zones in State and local responsibility areas for fire protection. In addition, LAFD designates lands within the City as a Very High Fire

[16] County of Los Angeles, Disaster Routes, Los Angeles County Operational Area, https://dpw.lacounty.gov/dsg/DisasterRoutes/, accessed January 9, 2019.
[17] County of Los Angeles, City of Los Angeles Central Area Disaster Routes, 2017.
[18] City of Los Angeles, Department of City Planning, General Plan Safety Element, Exhibit H, Critical Facilities & Lifeline Systems, adopted November 26, 1996.

Hazard Severity Zone based on criteria that include fuel loading, slope, fire weather, and other relevant factors. The Project Site is in a highly urbanized area and is not located within an area designated by CAL FIRE or LAFD as a Very High Fire Hazard Severity Zone.[19] The Project Site is also not located within an area designated by the City as a wildland fire hazard area.[20,21]

(7) Methane, Oil, and Gas

According to the City's Department of Building and Safety, the Project Site is not located within a Methane Zone or Methane Buffer Zone.[22] According to the California Division of Oil, Gas, and Geothermal Resources (DOGGR) online mapping system (DOGGR Well Finder), no oil or natural gas wells are located on or adjacent to the Project Site, indicating that methane is not considered to be a significant environmental concern in this area. The nearest well is approximately 0.4 miles south of the Project Site but was plugged and abandoned in 1969.[23] Similar to DOGGR, the City has also indicated that no oil wells are located on the Project Site.[24]

(8) Radon

Radon is a colorless, odorless, naturally occurring, radioactive, inert, gaseous element formed by radioactive decay of radium (Ra) atoms. Radon sampling was not conducted as part of the Phase I ESA or Phase II ESA. However, the California Department of Conservation and California Department of Public Health participated in the USEPA's State Radon Survey, a federal survey to measure levels of indoor radon in all states. Based on the results of this survey, the California Department of Public Health predicted that only approximately 0.5 percent of homes in Region 9, where the Project Site is located, would have radon concentrations over the USEPA action level of 4.0 picocuries per liter (pCi/L).[25]

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19 CAL FIRE, Los Angeles County Fire Hazard Severity Zones, September 2011.

20 City of Los Angeles Department of City Planning, General Plan Safety Element, Exhibit D: Selected Wildlife Hazard Areas, adopted November 26, 1996.

21 City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS), Parcel Profile Report [APN Search]: 5546-004-006, -020, -021, -029, -032; 5546-030-028; 031; 032; 033; 034. Generated February 8, 2018.

22 City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS), Parcel Profile Report [APN Search]: 5546-004-(006); 020; 021; 029; 032 and 5546-030-(028); 031; 032; 033; 034. Generated February 8, 2018.

23 Citadel Environmental, Phase I ESA, July 30, 2018, pp. 17 and 18. Provided in Appendix H-1 of this Draft EIR.

24 City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS), Parcel Profile Report [APN Search]: 5546-004-(006); 020; 021; 029; 032 and 5546-030-(028); 031; 032; 033; 034. Generated February 8, 2018.

25 Citadel Environmental, Phase I ESA, July 30, 2018, p. v. Provided in Appendix H-1 of this Draft EIR.

As discussed in the Phase I ESA, the USEPA Radon Zone for Los Angeles County is Zone 2, which indicates an average indoor concentration greater than or equal to 2.0 pCi/L of air and less than or equal to 4.0 pCi/L.[26] In a survey performed by the California Department of Public Health, 13 tests were performed within the 90028 zip code, where the Project is located, for the presence of radon. Of these, no tests were found to contain radon in excess of 4.0 pCi/L, indicating radon is not considered to be a significant environmental concern in this area.[27]

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to hazards and hazardous materials if it would:

Threshold (a): ***Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;***

Threshold (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;***

Threshold (c): ***Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;***

Threshold (d): ***Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment;***

Threshold (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, results in a safety hazard or excessive noise for people residing or working in the project area;***

[26] Citadel Environmental, Phase I ESA, July 30, 2018, p. v. Provided in Appendix H-1 of this Draft EIR.

[27] Citadel Environmental, Phase I ESA, July 30, 2018, p. v. Provided in Appendix H-1 of this Draft EIR.

Threshold (f): Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or

Threshold (g): Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G questions. The factors to evaluate hazards and hazardous materials impacts include:

(1) Risk of Upset/Emergency Preparedness

- The regulatory framework.
- The probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance.
- The degree to which a project may require a new, or interfere with an existing, emergency response or evacuation plan, and the severity of the consequences.
- The degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance.

(2) Human Health Hazards

- The regulatory framework.
- The probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance.
- The degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance.

b) Methodology

The evaluation of hazardous conditions and materials is based primarily on the Phase I ESA and Phase II ESAs prepared for the Project by Citadel Environmental. As previously stated, these reports are included in Appendix H-1 and H-2 of this Draft EIR.

The Phase I ESA identified the presence of hazardous materials occurring on the Project Site, the potential hazards posed by such materials, and recommendations for addressing identified potential hazards. The Phase I ESA was prepared to ASTM E1527-13, Standard Practice for Environmental Site Assessments, requirements for assessing the presence or potential presence of above-ground

and subsurface hazardous materials at the Project Site, as well with the requirements of 40 CFR, Part 312, Standards and Practices for All Appropriate Inquiry.

Tasks performed for the Phase I ESA included a review of title information pertaining to the Project Site; review and summary of prior environmental documents pertaining to the Project Site; an evaluation of standard environmental record sources contained within federal, State, and local environmental databases within specific search distances; an evaluation of additional environmental record sources obtained from local regulatory departments/agencies; a qualitative evaluation of the physical characteristics of the Project Site through a review of published topographic, geologic, and hydrogeologic maps, published groundwater data, and area observations to characterize surface water flow conditions; an evaluation of past site and adjacent/nearby property uses through a review of historical resources; a physical inspection of the Project Site (interior and exterior) conducted to search for conditions indicative of potential environmental concerns (e.g., USTs; ASTs; associated tank piping; stained soil or pavement; equipment that may contain or have historically contained ACM, PCB, LBP, etc.); a physical assessment of indications of past uses and visual observations of adjacent surrounding properties to assess potential impacts to the Project Site; and interviews with the client, a site owner representative, and local regulatory official. Based on the aforementioned research, testing and monitoring, the Phase I ESA identified whether any RECs occur on the Project Site.

The Phase II ESA evaluated the potential impacts to the Project Site associated with the identified and potential RECs. The tasks performed as part of the Phase II ESA included obtaining a soil boring permit, developing a health and safety plan, notifying utility services prior to drilling, soil sampling, and reporting.

c) Project Design Features

No Project Design Features are proposed with regard to hazards and hazardous materials.

d) Analysis of Project Impacts

Construction activities, including excavation depths, building footprint, and construction methods, would be essentially the same under the Project or the Project with the East Site Hotel Option. Accordingly, Project-related construction impacts would be essentially the same under the Project or the Project with the East Site Hotel Option. Thus, the conclusions regarding the construction impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

Although the East Senior Building under the Project with the East Site Hotel Option would be two floors shorter than under the Project, both would similarly redevelop

the Project Site. This difference in building height of the East Senior Building does not materially change the analysis of hazards and hazardous materials impacts under the Project. Accordingly, Project operational impacts discussed in the analyses below would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option

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

(1) Impact Analysis

(a) Construction

Construction of the Project would involve the demolition and removal of some buildings and structures, as described in Chapter II, *Project Description*, of this Draft EIR. During the demolition and construction phase, construction equipment and materials may include fuels, oils and lubricants, solvents and cleaners, cements and adhesives, paints and thinners, degreasers, cement and concrete, and asphalt mixtures, which are all commonly used in construction. It is reasonably anticipated that materials would be used, stored, and disposed of in consumer quantities and in accordance with applicable laws and regulations and manufacturers' instructions. The Project, including paint and solvent used on the new mixed-use buildings, would comply with SCAQMD Rule 1113. Compliance with applicable federal, State, and local requirements concerning the handling, storage, and disposal of hazardous waste would reduce the potential to release contaminants. **As such, impacts related to the routine transport, use, disposal, or accidental release of hazardous materials during demolition and construction of the Project or the Project with the East Site Hotel Option would be less than significant.**

(b) Operation

Project operation would involve a mix of residential uses, commercial uses, parking, and associated landscape and open space amenities. Limited quantities of common maintenance and janitorial supplies, such as cleaners and solvents for kitchens and bathrooms, paints and thinners for site maintenance, and other common chemicals found in typical residential and retail commercial uses, would be used during operation of the Project. The Project does not include any industrial land uses. The limited quantities and nature of chemical use by the Project would not be considered significant. The use of these materials would be in small quantities and in accordance with the manufacturers' specifications for use, storage, and disposal of such products which have been formulated to avoid substantial exposure hazards. Compliance with applicable federal, State, and local

requirements concerning the handling, storage and disposal of hazardous waste would reduce the potential to release contaminants. **As such, impacts related to the routine transport, use, disposal, or accidental release of hazardous materials during the Project or the Project with the East Site Hotel operation would be less than significant.**

(2) Mitigation Measures

Impacts regarding the routine transport, use, disposal, or accidental release of hazardous materials during Project construction and operation were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding the routine transport, use, disposal, or accidental release of hazardous materials during Project construction and operation were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (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?

(1) Impact Analysis

(a) Subsurface Soil and Soil Gas Contamination

The Project would include excavation of soils to accommodate the five levels of subterranean parking and foundations. Because soil testing did reveal the presence of VOCs in concentrations above applicable ESLs, it is conservatively concluded that there is the potential for contaminated soils and vapors to occur beneath the Project Site, which could result in a potentially significant impact or hazard to the public or the environment during excavation activities. Furthermore, on the West Site, other undocumented remnant steel structures, and possibly USTs, may still be located on the subsurface of the Project Site that were associated with historic on-site automotive-related maintenance and fueling activities. On the East Site, a possible underground steel structure may be located on Parcel I. To address potential hazards associated contaminated soils, soil vapors and remnant steel structures, and possibly USTs, Mitigation Measure HAZ-MM-1 is required for the Project, which involves preparation of a Soils Management Plan (SMP) for the entire Project Site.

In addition, Cal/OSHA regulates worker exposure to airborne contaminants (such as those identified in the subsurface soils) during construction under CCR Title 8,

Section 5155, Airborne Contaminants, which establishes a list of compounds that are considered a health risk, exposure limits for such compounds, protective equipment, workplace monitoring, and medical surveillance required for compliance. Cal/OSHA also regulates worker exposure to airborne contaminants (such as those identified in the subsurface soils) during operation, requiring administrative or engineering controls, where required, to meet exposure limits, and implementation of written health and safety programs, worker training, emergency response training, and medical surveillance.

Finally, the Project is not located within a City-designated Methane Hazard Zone, and while the Project Site is located within US EPA Radon Zone 2 where the predicted average indoor radon concentrations are between 2.0 and 4.0 pCi/L, these concentrations do not exceed the US EPA indoor action level for radon of 4.0 pCi/L. Thus, vapor encroachment from methane or radon is not a significant concern at the Project Site.

Based on the above, the Project and the Project with the East Site Hotel Option could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving hazardous materials as a result of contaminated soils or soil vapors, and impacts would be potentially significant. However, mitigation is required that would reduce this potentially significant impact to a less than significant level.

(b) ACM, LBP and PCB

The Project would not renovate or otherwise disturb the Gogerty Building or Capitol Records Building, which may contain LBP, ACM, or PCB. Thus, no hazardous materials impacts regarding these building would occur.

However, the Project would remove the single-story building constructed in 1978 on Parcel B currently used by AMDA for props and set storage. Also, on-site parking attendant kiosks would be removed. Thus, the AMDA building and parking booths may contain LBP, ACM and/or PCB. However, it is not uncommon for construction activities to encounter these potential hazards. ACM, LBP, and PCB are highly regulated. Testing of any suspected buildings or portions thereof for ACM, LBP, and PCB is part of standard construction practice at the time of demolition. In the event that ACM and/or LBP are discovered, their removal would be subject to specific and detailed SCAQMD and Cal/OSHA requirements to ensure the proper training, containment, handling, notification, and disposal of these materials by licensed asbestos and LBP abatement contractors. Similarly, PCB-containing lighting ballasts would be removed and disposed of in accordance with standard applicable regulations. **Compliance with regulatory requirements would ensure that impacts associated with ACM, LBP, and PCB would be less than significant.**

(2) Mitigation Measures

The following mitigation measures address impacts related to contaminated soils, soil vapor, and USTs:

> **HAZ-MM-1: Soil Management Plan**. The Project Applicant shall retain a qualified environmental consultant to prepare a Soils Management Plan (SMP), which shall be submitted to the Los Angeles Department of Building and Safety (LADBS) for review and approval prior to the commencement of excavation and grading activities. The SMP shall establish policy and requirements for the management and disposal of soils, as well as for any steel structures, including USTs, should they be encountered, during soil-disturbing activities performed at the Project Site (i.e., excavation, grading, trenching, utility installation or repair, and other human activities) that may disturb potentially contaminated soils. The SMP shall describe specific soil- and UST-handling controls required to comply with federal, state, and local, overseeing agencies; prevent unacceptable exposure to contaminated soils or vapors during construction; and prevent the improper disposal of contaminated soils or steel structures.

(3) Level of Significance After Mitigation

Mitigation Measure HAZ-MM-1 would establish policy and requirements for the management and disposal of soils, as well as for any steel structures, including USTs, should they be encountered, during soil-disturbing activities performed at the Project Site (i.e., excavation, grading, trenching, utility installation or repair, and other human activities) that may disturb potentially contaminated soils. The SMP would describe specific soil- and UST-handing controls required to comply with federal, State, and local overseeing agencies; prevent unacceptable exposure to contaminated soils or vapors during construction; and prevent the improper disposal of contaminated soils or steel structures. With implementation of Mitigation Measure HAZ-MM-1, potentially significant impacts to the public or the environment from the release of hazardous materials released during upset and/or accident conditions would be reduced to a less-than-significant level.

Threshold (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?

(1) Impact Analysis

As discussed in Subsection IV.F.2.b, Existing Conditions, above, no LAUSD elementary, middle, or high schools are located within one-quarter mile of the Project Site. The nearest LAUSD school to the Project Site is Cheremoya Avenue Elementary School, located 0.29 miles of the Project Site. However, in a dense metropolitan area, such as Los Angeles, day care centers and/or pre-schools are

sometimes associated with civic, business, and residential uses in the area and are considered sensitive receptors to hazardous materials or substances. For instance, the Hollywood Presbyterian Children's Center Preschool is located 0.2 miles east of the Project Site, and the Montessori Shir-Hashirim Los Angeles is located 0.25 miles southeast of the Project Site.

Project construction activities would include the use or architectural coatings and the use of diesel-powered construction equipment, which could generate VOCs or diesel particulate matter (DPM) emissions. Exposure to DPM may be a health hazard, particularly to children whose lungs are still developing. An analysis of the Project TACs emissions (including VOCs emissions) was conducted as part of the analysis in Section IV.B, *Air Quality*, of this Draft EIR, and includes analysis of the sensitive receptors (i.e., schools). As indicated therein, Project construction-related TACs would be less than significant with the Project's use of Tier IV construction equipment required as mitigation. In addition, Mitigation Measure HAZ-MM-1 would establish requirements for the handling, management and disposal of any contaminated soils or structures, which prevent unacceptable exposure to contaminated soils or vapors during construction at any nearby school.

The Project operation would include a mix of residential, office, commercial uses, and potentially hotel uses, rather than heavy industrial, utility, transportation, power plant, or waste disposal uses most often associated with hazardous emissions. Project operations would involve the limited use of potentially hazardous materials typical of those used in residences, commercial developments, hotels and restaurants, including cleaning agents, paints, pesticides, and other materials used for landscaping. The Project would neither include the handling of acutely hazardous materials nor the emission of hazardous materials other than, potentially, VOCs. VOCs are typically formed from combustion of fuels and/or released through evaporation of organic liquids and internal combustion associated with diesel vehicles usage and consumer products (e.g., architectural coatings, etc.). These VOC emissions are common in urban uses and would not significantly affect any nearby school. All hazardous materials on the Project Site would be handled, used, stored, and disposed of in accordance with all manufacturers' specifications and all applicable federal, State, and local requirements such tat schools are not adversely impacted.

Based on the above, with compliance to applicable federal, state, and local laws and regulations relating to environmental protection and the management of hazardous materials, adherence to manufacturer's instructions for safe handling and disposal of hazardous materials, and implementation of Mitigation Measure HAZ-MM-1, potentially significant Project or Project with the East Site Hotel Option impacts regarding hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, would be less than significant.

(2) Mitigation Measures

Impacts during construction regarding hazardous emissions or use of acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school during Project construction would be addressed by Mitigation Measure HAZ-MM-1. Operational impacts were determined to be less than significant without mitigation. Therefore, no operational mitigation measures are required.

(3) Level of Significance After Mitigation

With implementation of Mitigation Measure HAZ-MM-1, potentially significant impacts regarding hazardous emissions or use of acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school during Project construction would be reduced to a less-than-significant level. Operational impacts were determined to be less than significant without mitigation. Therefore, no operational mitigation measures were required or included, and the impact level remains less than significant.

Threshold (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 it create a significant hazard to the public or the environment?

(1) Impact Analysis

As part of the Phase I ESA, a hazardous materials regulatory agency database search was conducted by EDR for the Project Site. While the Project Site was listed in several databases, as described above in the Existing Conditions subsection, **the Project Site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would not create a significant hazard to the public or the environment. Therefore, no impact would occur with respect to Threshold (d), and no further analysis is required.**

(2) Mitigation Measures

No impacts would occur regarding the Project Site being on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

No impacts would occur regarding the Project Site being on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, no mitigation measures were required or included.

Threshold (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 or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the project area?

As discussed in Subsection IV.6, Impacts Found Not to be Significant, and in the Initial Study (Appendix A) of this Draft EIR, the Project Site is not within an airport land use plan or two miles of a public airport or public use airport. **As a result, the Project or the Project with the East Site Hotel Option would not result in a safety hazard or excessive noise to people residing or working in the Project Site. No impact would occur with respect to Threshold (e). No further analysis is required.**

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

(1) Impact Analysis

(a) Construction

As discussed above, the Safety Element includes a Critical Facilities & Lifeline Systems map (Exhibit H), which provides designated disaster routes in the City of Los Angeles. Based on the Safety Element, the roads adjacent to the Project are not City- or County-designated disaster routes. The nearest disaster routes are Santa Monica Boulevard approximately 0.8 miles to the south, and Highland Avenue located approximately 0.6 miles to the west.

Construction of the Project would occur within the boundaries of the Project Site and within the rights-of way of adjacent streets, including the median within Vine Street and signal installation along Argyle Avenue. Temporary pedestrian or vehicular public right-of-way closures may be necessary during the construction phase for construction staging, equipment access, and pedestrian safety. Temporary closures may also be necessary on the portions of the Hollywood Walk of Fame that run along Vine Street (both the east and west sides of the street) from Yucca Street fronting the Project Site. Temporary partial lane closures are not anticipated to significantly affect emergency vehicle circulation around the Project Site. Emergency vehicles normally have a variety of options for dealing with traffic and congestions, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. In addition, as discussed in Section IV.L, *Transportation*, of this Draft EIR, the Project would implement Project Design Feature TRAF-PDF-2, which requires preparation of a Construction Traffic Management Plan. This Plan will include street closure information, a detour plan, haul routes, and a staging plan and will be submitted to the City for review and

approval. Vehicular traffic, bicyclists, and pedestrians would be routed around any such closures to facilitate the traffic flow until such street closures are complete. Thus, construction of the Project would not substantially impede public access, create severe consequences for emergency response vehicles, substantially impede travel upon a public right-of-way, or interfere with an adopted emergency response or evacuation plan. **Therefore, the Project or the Project with the East Site Hotel Option construction would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.**

(b) Operation

The Project would not include a land use that would constitute a potential hazard to the community (such as an airport, oil refinery, or chemicals plant) or close any existing streets or otherwise represent a significant impediment to emergency response and evacuation of the local area.

As discussed in Sections IV.K.1, *Fire Protection*, and IV.K.2, *Police Protection*, impacts to these services from Project implementation would be less than significant. Under the Project, Santa Monica Boulevard and Highland Avenue would still be available as Disaster Routes, even with the addition of Project traffic. No policy or procedural changes to an existing risk management plan, emergency response plan, or evacuation plan would be required due to Project implementation. Furthermore, during an unanticipated disaster event, the EOO along with City agencies (i.e., LAPD and LAFD) would implement operational protocols, as well as plans and programs, on a case-by-case basis, to facilitate emergency evacuations and/or response, which would consider traffic conditions at the time of the emergency. In such instances, traffic would be routed along the City's numerous disaster routes, as determined appropriate by the applicable responding City agencies.

Also, the increase in operational traffic generated by the Project would not significantly impact emergency vehicle response to the Project Site and surrounding uses as the drivers of emergency vehicles normally have a variety of routes and measures for dealing with traffic and congestion, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic.

As discussed in Section 4.K.1, *Public Services - Fire Protection*, of this Draft EIR, the Project would be designed to comply with applicable Los Angeles Building Code and Fire Code requirements, including compliance with LAFD fire apparatus and personnel access requirements. Site accessibility and design would be reviewed and approved by the LAFD. The Project would also be required to establish, implement, and maintain on file an emergency response plan, which would be inspected annually by the LAFD. Project accessibility features would not adversely affect the delivery of emergency services in the Project vicinity.

Based on the above, the Project or the Project with the East Site Hotel Option would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

(2) Mitigation Measures

Impacts regarding the Project's impairment of implementation or interference with an adopted emergency response plan or emergency evacuation plan were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding the Project's impairment of implementation or interference with an adopted emergency response plan or emergency evacuation plan were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

(1) Impact Analysis

The Project Site is located in an urbanized area. No wildlands are present on the Project Site or surrounding area. Furthermore, the Project Site is not within a City-designated wildfire hazard area, or a CAL FIRE, Fire Hazard Severity Zone.[28,29] **Therefore, the Project would not expose people or structures, directly or indirectly, to a significant risk involving wildland fire, and no impacts would occur related to Threshold (g). As such, no further analysis is required.**

(2) Mitigation Measures

No impacts would occur regarding wildland fires. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

No impacts would occur regarding wildland fires. Therefore, no mitigation measures were required or included.

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[28] City of Los Angeles Department of City Planning, General Plan Safety Element, adopted November 26, 1996, p. 53.

[29] City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS), Parcel Profile Report [APN Search]: 5546-004-(006); 020; 021; 029; 032 and 5546-030-(028); 031; 032; 033; 034. Generated February 8, 2018.

e) Cumulative Impacts

Construction activities, including excavation depths, building footprint, and construction methods, would be essentially the same under the Project and the Project with the East Site Hotel Option. Accordingly, Project-related cumulative construction impacts would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the cumulative construction impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

Although the East Senior Building under the Project with the East Site Hotel Option would be two floors shorter than under the Project, both would similarly redevelop the Project Site. Accordingly, cumulative operational impacts would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the cumulative operational impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option

(1) Impact Analysis

Generally, the geographic context for cumulative impact analysis of hazards and hazardous materials includes the related projects in the vicinity of the Project that, when viewed together with the Project, could incrementally increase a hazards impact to a significant level. As described above, the Phase I ESA identified potentially hazardous conditions located up to one-mile around the Project Site. The Phase I identified several historical dry cleaning facilities along Yucca Street near the Project Site. However, none of the related projects are located on these former dry cleaning sites and, thus, would not contribute to a cumulative impact together with the Project. It is noted that Related Project No. 1 (Argyle House) and No. 3 (Kimpton-Everly Hotel) are already constructed and in operation.

Construction and operation of the related projects (e.g., primarily the development currently occurring in the Hollywood Area) could reasonably be expected to involve the limited use of potentially hazardous materials typical those used in residential and commercial developments, including gasoline, lubricants, cleaning agents, paints, and pesticides. Each related project would be subject to applicable laws and regulations and manufacturers' specifications to ensure the safe transport, storage, handling, and disposal of such materials.

Related projects keyed to Figure III-1 (see Chapter III, *Environmental Setting*, of this Draft EIR) that are geographically nearest or adjacent to the Project Site include:

- Related Project No. 1 – 6230 W Yucca Street (already built and in operation)

- Related Project No. 2 – 1718 N. Vine Street (not yet constructed)
- Related Project No. 3 – 1800 N. Argyle Avenue (already built and in operation)
- Related Project No. 4 – 6220 W. Yucca Street (not yet constructed)

These related projects are not anticipated to create a significant hazard to the public or environment because the potentially hazardous materials typically used in such developments are limited to relatively small volumes of commonplace materials. In addition, each of these developments would be required to comply with its site-specific development standards and applicable hazardous materials handling and transporting regulations and manufacturer's specifications. Lastly, according to the Phase I ESA, these related project sites are not included on any of the hazardous materials regulatory database listings that represent environmental concerns to the Project Site. **Based on the above, the Project and the Project with the East Site Hotel Option's contribution to cumulative significant hazardous materials impacts regarding: the routine transport, use, or disposal of hazardous materials; 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; or emitting hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, would not be cumulatively considerable and, thus, cumulative impacts would be less than significant.**

The Project and the Project with the East Site Hotel Option would result in no impacts regarding being located on a hazardous materials site compiled pursuant to Government Code Section 65962.5 and wildland fires. **Thus, the Project and the Project with the East Site Hotel Option would not have the potential to contribute to cumulative impacts.**

With regards to cumulative impacts on emergency response/evacuation plans, the Project and the Project with the East Site Hotel Option, and related projects, would be required to prepare construction traffic management plan, which would include street closure information, a detour plan, haul routes, and a staging plan, which would be submitted to the City for review and approval. These plans would account for construction of related projects to minimize traffic conflicts and maintain emergency access on area roadways. As with the Project, related projects would be designed to comply with applicable Los Angeles Building Code and Fire Code requirements, including compliance with LAFD fire apparatus and personnel access requirements. The Project and the Project with the East Site Hotel Option, and related projects, would also be required to establish, implement, and maintain on file an emergency response plan, which would be inspected annually by the LAFD. Furthermore, the City revises its emergency response/evacuation plans on a periodic basis, as required, to address increased growth and changes in regulatory requirements. For these reasons, the Project and the Project with the

East Site Hotel Option, together with related projects, would provide adequate accessibility features and would not adversely affect the delivery of emergency services or impair emergency evacuation in the Project vicinity.

Based on the above, the Project's or the Project with the East Site Hotel Option's contribution to cumulative impacts, relative to significant hazards and hazardous materials impacts would not be cumulatively considerable and, thus, cumulative hazards and hazardous materials impacts would be less than significant.

(2) Mitigation Measures

Cumulative impacts related to hazards and hazardous materials would be less than significant with implementation of Mitigation Measure HAZ-MM-1. No additional mitigation measures to address cumulative impacts are required.

(3) Level of Significance after Mitigation

Cumulative impacts related to hazards and hazardous materials would be less than significant with implementation of Mitigation Measure HAZ-MM-1.

IV. Environmental Impact Analysis

G. Hydrology and Water Quality

1. Introduction

This section analyzes the Project's potential impacts with regard to hydrology and water quality, including water quality standards, drainage flow and associated erosion and/or flooding, and stormwater runoff. The analysis is, in large part, based on the Hydrology and Water Quality Report (Hydrology Report) prepared for the Project by KPFF Consulting Engineers, included as Appendix I of this Draft EIR.[1] The analysis also is partly based on information from the 2018 Phase I Environmental Site Assessment (Phase I ESA) and 2018 Phase II Site Investigation Report (Phase II ESA), both prepared by Citadel Environmental and provided in Appendices H-1 and H-2 of this Draft EIR.[2,3]

2. Environmental Setting

a) Regulatory Framework

(1) Federal

(a) Clean Water Act

The Clean Water Act (CWA), formerly known as the Water Pollution Control Act, was first introduced in 1948, with major amendments in the 1960s, 1970s, and 1980s. The CWA authorizes federal, State, and local entities to cooperatively create comprehensive programs for eliminating or reducing the pollution of state waters and tributaries. Amendments to the CWA in 1972 deemed the discharge of pollutants into waters of the United States from any point source unlawful unless authorized by a United States Environmental Protection Agency (USEPA) National Pollutant Discharge Elimination System (NPDES) permit. Although federally mandated, states generally administer the NPDES permit program.

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1 KPFF Consulting Engineers, Hollywood Center Hydrology and Water Quality Report, March 13, 2020. Provided in Appendix I of the Draft EIR.

2 Citadel Environmental, Phase I Environmental Site Assessment Report, Hollywood Center Project, Los Angeles, California 90028, July 30, 2018. Provided in Appendix H-1 of the Draft EIR.

3 Citadel Environmental, Phase II Site Investigation Report, Hollywood Center Project, Los Angeles, California 90028, November 9, 2018, revised December 3, 2019. Provided in Appendix H-2 of the Draft EIR.

Amendments to the CWA in 1987 required the USEPA to create specific requirements for discharges. In response to the 1987 amendments to the CWA, Phase I of the USEPA NPDES Program required NPDES permits for: (1) Municipal Separate Storm Sewer Systems (MS4) generally serving, or located in, incorporated cities with 100,000 or more people (referred to as municipal permits); (2) eleven specific categories of industrial activity (including landfills); and (3) construction activity that disturbs five acres or more of land. As of March 2003, Phase II of the NPDES Program extends the requirements for NPDES permits to numerous small MS4s, construction sites of one to five acres, and industrial facilities owned or operated by small MS4s, which were previously exempted from permitting.

In addition, the CWA requires states to adopt water quality standards for receiving water bodies and to have those standards approved by the USEPA. Water quality standards consist of designated beneficial uses of a particular receiving water body (e.g., wildlife habitat, agricultural supply, recreation, etc.), along with water quality criteria necessary to support those uses. Water quality criteria are either prescribed concentrations or levels of constituents, such as lead, suspended sediment, and fecal coliform bacteria, or narrative statements identifying maximum concentrations of various pollutants that would not interfere with the designated use.

When water quality compromises designated beneficial uses of a particular receiving water body, Section 303(d) of the CWA requires identifying and listing the water body as “impaired” and identifying Total Maximum Daily Loads (TMDLs) for the impairing pollutant(s). A TMDL is an estimate of the total load of pollutants from point, non-point, and natural sources that a water body may receive without exceeding applicable water quality standards (with a “factor of safety” included). Once established, TMDLs allocate the loads among current and future pollutant sources to the water body.

The CWA requires states to publish, every two years, an updated list of streams and lakes that are not meeting their designated uses because of excess pollutants (i.e., impaired water bodies). The list, known as the 303(d) list, summarizes violations of water quality standards. Once a TMDL is developed and adopted, the water quality violation is removed from the 303(d) list.

In general, where urban runoff is identified as a substantial source of pollutants causing the impairments and is subject to load allocating, implementation of and compliance with the TMDL requirements are administered through a combination of individual Industrial Stormwater Permits, the General Industrial and General Construction Stormwater Permits, and the County of Los Angeles’ municipal stormwater NPDES Program, specifically through the MS4 Permit, as described below.

(b) Federal Antidegradation Policy

The Federal Antidegradation Policy requires states to develop statewide antidegradation policies and identify methods for implementing them.[4] Pursuant to the Code of Federal Regulations, State antidegradation policies and implementation methods shall, at a minimum, protect and maintain (1) existing in-stream water uses; (2) existing water quality, where the quality of the waters exceeds levels necessary to support existing beneficial uses, unless the state finds that allowing lower water quality is necessary to accommodate economic and social development in the area; and (3) water quality in waters considered an outstanding national resource.

(c) Safe Drinking Water Act

The Safe Drinking Water Act (SDWA) is the main federal law that ensures the quality of Americans' drinking water. Under SDWA, the USEPA sets standards for drinking water quality and oversees the states, localities, and water suppliers who implement those standards. SDWA was originally passed by Congress in 1974 to protect public health by regulating the nation's public drinking water supply. The law was amended in 1986 and 1996 and requires actions to protect drinking water and its sources: rivers, lakes, reservoirs, springs, and groundwater wells.

(2) State

(a) Porter-Cologne Water Quality Act (California Water Code)

The Porter-Cologne Water Quality Control Act established the legal and regulatory framework for California's water quality control.[5] The California Water Code (CWC) authorizes the State Water Resources Control Board (SWRCB) to implement the provisions of the CWA, including the authority to regulate waste disposal and require cleanup of discharges of hazardous materials and other pollutants.

Under the CWC, the State is divided into nine Regional Water Quality Control Boards (RWQCBs), governing the implementation and enforcement of the CWC and the CWA. The Project Site is located within Region 4, also known as the Los Angeles Region. The RWQCBs develop and enforce water quality objectives and implement plans that will best protect California's waters, acknowledging areas of different climate, topography, geology, and hydrology. Each RWQCB is required to formulate and adopt a Water Quality Control Plan (Basin Plan) for its region. The Basin Plan must adhere to the policies set forth in the CWC and established by the SWRCB. The RWQCB is also given authority to issue waste discharge requirements, enforce action against stormwater discharge violators, and monitor

4 Code of Federal Regulations, Title 40, Section 131.12.

5 State Water Resources Control Board, Porter-Cologne Water Quality Control Act, January 2019.

water quality. In California, the NPDES stormwater permitting program is administered by the SWRCB.

Section 13050 of the CWC, part of the Porter-Cologne Act, defines pollution, contamination, and nuisance. Pollution is defined as alteration of water quality such that it unreasonably affects the water's beneficial uses; contamination is defined as impairment of water quality to the degree that it creates a hazard to public health; and a nuisance is defined as anything that is injurious to health, offensive to the senses, an obstruction to property use, and which affects a considerable number of people.

(b) California Antidegradation Policy

The California Antidegradation Policy, otherwise known as the Statement of Policy with Respect to Maintaining High Quality Water in California, was adopted by the SWRCB in 1968.[6] Unlike the Federal Antidegradation Policy, the California Antidegradation Policy applies to all waters of the State, not just surface waters. The policy states that whenever the existing quality of a water body is better than the quality established in individual Basin Plans, such high quality shall be maintained and discharges to that water body shall not unreasonably affect present or anticipated beneficial use of such water resource.

(c) California Toxics Rule

In 2000, the USEPA promulgated the California Toxics Rule, which establishes water quality criteria for certain toxic substances to be applied to waters in the State.[7] The USEPA promulgated this rule based on the USEPA's determination that the numeric criteria are necessary in the State to protect human health and the environment. The California Toxics Rule establishes acute (i.e., short-term) and chronic (i.e., long-term) standards for bodies of water, such as inland surface waters and enclosed bays, that are designated by the Los Angeles Regional Water Quality Control Board (LARWQCB) as having beneficial uses protective of aquatic life or human health.

(d) California Water Plan

The California Water Plan (the Plan), as required by CWC Section 1005(a) and prepared by the California Department of Water Resources, is the State government's strategic plan for managing and developing water resources statewide for current and future generations and provides a framework for water managers, legislators, and the public to consider options and make decisions

6 State Water Resources Control Board, Resolution No. 68-16, 1968.

7 United States Environmental Protection Agency (USEPA), Water Quality Standards: Establishment of Numeric Criteria for Priority Toxic Pollutants for the State of California (California Toxics Rule), April 2000.

regarding California's water future. The Plan, updated every five years, presents basic data and information on California's water resources including water supply evaluations and assessments of agricultural, urban, and environmental water uses to quantify the gap between water supplies and uses. The California Water Plan Update 2018 was updated in June 2019.[8] The Plan also identifies and evaluates existing and proposed statewide demand management and water supply augmentation programs and projects to address the State's water needs.

The goal for updating the Plan is to meet CWC requirements, receive broad support among those participating in California's water planning, and serve as a useful document for the public, water planners, legislators, managers, and other decision-makers.

(e) Sustainable Groundwater Management Act of 2014

The Sustainable Groundwater Management Act of 2014 (SGMA) creates a framework for sustainable, local groundwater management in California. SGMA allows local agencies to customize groundwater sustainability plans to their regional economic and environmental needs. This act requires local regions to create a groundwater sustainability agency (GSA) and to adopt groundwater management plans for groundwater basins or subbasins that are designated as medium or high priority. High-priority and medium-priority basins or subbasins must adopt groundwater management plans by 2020 or 2022, depending upon whether the basin is in critical overdraft. The Project Site is in the Hollywood subbasin of the Coastal Plain of the Los Angeles Basin. The Hollywood subbasin is classified as a very low priority and does not have a specific subbasin groundwater management plan.

(3) Regional

(a) Board Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties

As required by CWC, the LARWQCB has adopted the Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan). Specifically, the Basin Plan designates beneficial uses for surface water and groundwater, sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State's anti-degradation policy, and describes implementation programs to protect all waters in the Los Angeles Region. In addition, the Basin Plan incorporates (by reference) all applicable State and Regional Board plans and

8 California Department of Water Resources, California Water Plan Update 2018, June 2019.

policies and other pertinent water quality policies and regulations. Those of other agencies are referenced in appropriate sections throughout the Basin Plan.[9]

The Basin Plan is a resource for the LARWQCB and others who use water and/or discharge wastewater in the Los Angeles Region. Other agencies and organizations involved in environmental permitting and resource management activities also use the Basin Plan. Finally, the Basin Plan provides valuable information to the public about local water quality issues.

(b) Ballona Creek Watershed Enhanced Watershed Management Program

The Los Angeles County MS4 Permit allows Permittees the flexibility to develop Watershed Management Programs (WMPs) or Enhanced Watershed Management Programs (EWMPs) to implement the requirements of the MS4 Permit on a watershed scale through customized strategies, control measures, and BMPs. Participation in a WMP or EWMP is voluntary and allows a Permittee to address the highest watershed priorities, including complying with the MS4 Permit requirements.[10] The City, with other agencies in the Ballona Creek Watershed, has developed an EWMP for the Ballona Creek Watershed. The EWMP identifies measures (e.g., discharge requirements; low impact development (LID), green streets, and regional best management practices (BMPs); and stormwater infiltration/pollution reduction project) to achieve compliance with Ballona Creek TMDLs and other water quality mandates, while maximizing potential benefits of stormwater for local water supply. The Ballona Creek Watershed EWMP was approved by the LARWQCB on April 20, 2016. The EWMP is applicable to the Project in that Project stormwater runoff would indirectly drain to Ballona Creek.

(c) County of Los Angeles Hydrology Manual

Per the City's Special Order No. 007-1299, issued on December 3, 1999, the City has adopted the Los Angeles County Department of Public Works' Hydrology Manual (Hydrology Manual) as its basis of design for storm drainage facilities. The Hydrology Manual requires that a storm drain conveyance system be designed for a 25-year storm event and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year storm event. Areas with sump conditions[11] are required to have a storm drain conveyance system capable of conveying flow from a 50-year storm event.[12] The County also limits the allowable discharge into existing storm drain facilities based on the MS4 Permit, which is

9 California Regional Water Quality Control Board, Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, adopted June 13, 1994.

10 California Water Board, Los Angeles R4, http://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/watershed_management/, accessed December 12, 2018.

11 A sump, or depression, is an area from which there is no surface flow outlet.

12 Los Angeles County Department of Public Works, Hydrology Manual, January 2006.

enforced on all new developments that discharge directly into the County's storm drain system. Any proposed drainage improvements of County-owned storm drain facilities, such as catch basins and storm drain line, require review and approval by the Los Angeles County Flood Control District.

(d) National Pollutant Discharge Elimination System (NPDES) Permit Program

The NPDES permit program was first established under authority of the CWA to control the discharge of pollutants from any point source into the waters of the U.S. As indicated above, in California, the NPDES stormwater permitting program is administered by the SWRCB through its nine RWQCBs.

SWRCB Order No. 2012-0006-DWQ, known as the Construction General Permit, was adopted on July 17, 2012. The Construction General Permit regulates construction activity, including clearing, grading, and excavation of areas one acre or more in size and prohibits the discharge of materials other than stormwater, authorized non-stormwater discharges, and all discharges that contain a hazardous substance, unless a separate NPDES permit has been issued for those discharges. This NPDES permit establishes a risk-based approach to stormwater control requirements for construction projects by identifying three project risk levels. The main objectives of the General Permit are to:

1. Reduce erosion;
2. Minimize or eliminate sediment in stormwater discharges;
3. Prevent materials used at a construction site from contacting stormwater;
4. Implement a sampling and analysis program;
5. Eliminate unauthorized non-stormwater discharges from construction sites;
6. Implement appropriate measures to reduce potential impacts on waterways both during and after construction of projects; and
7. Establish maintenance commitments on post-construction pollution control measures.

(i) Stormwater Pollution Prevention Plan

California mandates requirements for all construction activities disturbing more than one acre of land to develop and implement Stormwater Pollution Prevention Plans (SWPPP). The SWPPP documents the selection and implementation of BMPs for a specific construction project, charging owners with stormwater quality management responsibilities. A construction site subject to the Construction

General Permit must prepare and implement a SWPPP that meets the requirements of the Construction General Permit.[13,14]

A SWPPP is meant to identify potential sources and types of pollutants associated with construction activity and list BMPs that would prohibit pollutants from being discharged from the construction site into the public storm drain system. BMPs typically address stabilization of construction areas, minimization of erosion during construction, sediment control, control of pollutants from construction materials, and post-construction stormwater management (e.g., the minimization of impervious surfaces or treatment of stormwater runoff). The SWPPP is also required to include a discussion of the proposed program to inspect and maintain all BMPs.

A site-specific SWPPP could include, but not be limited to, the following BMPs:

- Erosion Control BMPs – consist of management of soil surface to prevent soil particles from detaching. Selection of the appropriate erosion control BMPs would be based on minimizing areas of disturbance, stabilizing disturbed areas, and protecting slopes/channels. Such BMPs may include, but would not be limited to, use of geotextiles and mats, earth dikes, drainage swales, and slope drains.
- Sediment Control BMPs – consist of treatment controls that trap soil particles that have been detached by water or wind. Selection of the appropriate sediment control BMPs would be based on keeping sediments on-site and controlling the site boundaries. Such BMPs may include, but would not be limited, to use of silt fences, sediment traps, and sandbag barriers, street sweeping and vacuuming, and storm drain inlet protection.
- Wind Erosion Control BMPs – consist of applying water to prevent or minimize dust nuisance.
- Tracking Control BMPs – consist of preventing or reducing the tracking of sediment off-site by vehicles leaving the construction area. These BMPs include street sweeping and vacuuming. Project sites are required to maintain a stabilized construction entrance to prevent off-site tracking of sediment and debris.
- Non-Stormwater Management BMPs – also referred to as “good housekeeping practices,” involve keeping a clean, orderly construction site.
- Waste Management and Materials Pollution Control BMPs – consist of implementing procedural and structural BMPs for handling, storing, and disposing of wastes generated by a construction project to prevent the release

13 State Water Resources Control Board, National Pollutant Discharge Elimination System–Wastewater, 2018, http://www.swrcb.ca.gov/water_issues/programs/npdes/, accessed July 26, 2018.

14 USEPA, National Pollutant Discharge Elimination System, 2018, https://www.epa.gov/npdes, accessed July 26, 2018.

of waste materials into stormwater runoff or discharges through the proper management of construction waste.

(ii) NPDES Permit for Discharges of Groundwater from Construction and Project Dewatering

Dewatering operations are practices that discharge non-stormwater, such as ground water, that must be removed from a work location into the drainage system to proceed with construction into the drainage system. Discharges from dewatering operations can contain high levels of fine sediments, which if not properly treated, could lead to exceedance of the NPDES requirements. A NPDES Permit for dewatering discharges was adopted by the LARWQCB on September 13, 2018 (Order No. R4-2018-0125, General NPDES Permit No. CAG994004). Similar to the Construction General Permit, to be authorized to discharge under this permit, the developer must submit a Notice of Intent (NOI) to discharge groundwater generated from dewatering operations during construction in accordance with the requirements of this Permit.[15]

(iii) Low Impact Development Plan

In accordance with Section 402(p) of the CWA, the municipal NPDES Permit allows stormwater discharges, except under certain conditions, and require controls to reduce pollutants in those discharges to the maximum extent practicable. Such controls include BMPs, as well as system, design, and engineering methods. A municipal NPDES permit has been issued to the County and 84 incorporated cities. The Los Angeles County Municipal NPDES Permit requires implementation of the Storm Water Quality Management Program prepared as part of the NPDES approval process. The municipal NPDES permit includes a separate MS4 Permit, which applies to publicly-owned separate storm sewer systems, such as curbs, gutters and storm sewers that do not connect with a wastewater collection system or treatment plant.

Under the Los Angeles County Municipal NPDES Permit, permittees are required to implement a development planning program to address stormwater pollution. This program requires project applicants for development projects to implement a Low Impact Development (LID) Plan (which replaces the former Standard Urban Stormwater Mitigation Plan [SUSMP]) throughout the operational life of the project. The purpose of the LID is to reduce the discharge of pollutants in stormwater by outlining BMPs, which must be incorporated into the design of new development and redevelopment. These treatment control BMPs must be sufficiently designed

15 Los Angeles Regional Water Quality Control Board (LARWQCB), Order No. R4-2018-0125, General NPDES Permit No. CAG994004, Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, September 13, 2018.

and constructed to treat or filter the greater of an 85th percentile rain event or first 0.75 inch of stormwater runoff from a storm event.

(e) Stormwater Quality Management Program

In compliance with the Los Angeles County Municipal NPDES Permit, the Co-Permittees are required to implement a Stormwater Quality Management Program (SQMP) with the goal of accomplishing the requirements of the Los Angeles County Municipal NPDES Permit and reducing the amount of pollutants in stormwater runoff. The SQMP requires the County and the 84 incorporated cities to:

- Implement a public information and participation program to conduct outreach on storm water pollution;
- Control discharges at commercial/industrial facilities through tracking, inspecting, and ensuring compliance at facilities that are critical sources of pollutants;
- Implement a development planning program for specified development projects;
- Implement a program to control construction runoff from construction activity at all construction sites within the relevant jurisdictions;
- Implement a public agency activities program to minimize storm water pollution impacts from public agency activities; and
- Implement a program to document, track, and report illicit connections and discharges to the storm drain system.

The Los Angeles County Municipal NPDES Permit contains the following provisions for implementation of the SQMP by the Co-Permittees:

1. General Requirements:
   - Each permittee is required to implement the SQMP in order to comply with applicable stormwater program requirements.
   - The SQMP shall be implemented and each permittee shall implement additional controls so that discharge of pollutants is reduced.
2. BMP Implementation:
   - Permittees are required to implement the most effective combination of BMPs for stormwater/urban runoff pollution control. This should result in the reduction of storm water runoff.

3. Revision of the SQMP:

   - Permittees are required to revise the SQMP in order to comply with requirements of the RWQCB while complying with regional watershed requirements and/or waste load allocations for implementation of TMDLs for impaired waterbodies.

4. Designation and Responsibilities of the Principal Permittee:

The County Flood Control is designated as the Principal Permittee who is responsible for:

- Coordinating activities that comply with requirements outlined in the NPDES Permit;
- Coordinating activities among Permittees;
- Providing personnel and fiscal resources for necessary updates to the SQMP;
- Providing technical support for committees required to implement the SQMP; and
- Implementing the Countywide Monitoring Program required under this Order and assessing the results of the monitoring program.

5. Responsibilities of Co-Permittees:

Each Co-Permittee is required to comply with the requirements of the SQMP as applicable to the discharges within its geographical boundaries. These requirements include:

- Coordinating among internal departments to facilitate the implementation of the SQMP requirements in an efficient way;
- Participating in coordination with other internal agencies as necessary to successfully implement the requirements of the SQMP; and
- Preparing an annual Budget Summary of expenditures for the storm water management program by providing an estimated breakdown of expenditures for different areas of concern, including budget projections for the following year.

6. Watershed Management Committees (WMCs):

   - Each WMC shall be comprised of a voting representative from each Permittee in the Watershed Management Area (WMA).

- Each WMC is required to facilitate exchange of information between co-permittees, establish goals and deadlines for WMAs, prioritize pollution control measures, develop and update adequate information, and recommend appropriate revisions to the SQMP.

7. Legal Authority:

Co-Permittees are granted the legal authority to prohibit non-storm water discharges to the storm drain system including discharge to the MS4 from various development types.

(f) Los Angeles County Municipal Separate Storm Sewer System (MS4) Permit

USEPA regulations require that MS4 permittees implement a program to monitor and control pollutants being discharged to the municipal system from both industrial and commercial projects that contribute a substantial pollutant load to the MS4. The LARWQCB originally issued a Municipal Storm Water NPDES Permit (No. CAS004001) in December 2001, which requires new development and redevelopment projects to incorporate storm water mitigation measures. Also known as an MS4 Discharge Permit, the permit (Order No. R4-2012-0175-A01) was amended and updated by SWRCB Order WQ 2015-0075 on September 8, 2016. Under the Municipal Storm Water NPDES Permit, redevelopment is defined as any land-disturbing activity that results in the creation, addition, or replacement of 5,000 square feet or more of impervious surface area on an already developed site.

The City is a permittee under the Los Angeles County MS4 Permit and, therefore, has legal authority to enforce the terms of the MS4 permit within its jurisdiction. The Los Angeles County MS4 Permit is intended to ensure that combinations of site planning, source control and treatment control practices are implemented to protect the quality of receiving waters.

(4) Local

(a) Los Angeles Municipal Code

(i) Section 62.105, Construction "Class B" Permit

Proposed drainage improvements within the street right-of-way or any other property owned by, to be owned by, or under the control of the City, requires the approval of a B-permit (Los Angeles Municipal Code [LAMC] Section 62.105). Under the B-permit process, storm drain installation plans are subject to review and approval by City of Los Angeles Bureau of Engineering (BOE). Additionally, connections to the City's storm drain system from a property line to a catch basin or a storm drain pipe require a storm drain permit from BOE.

(ii) Sections 12.40 through 12.43, Landscape Ordinance (Ordinance No. 170,978)

In 1996, Ordinance No. 170,978 amended LAMC Sections 12.40 through 12.43 to establish consistent landscape requirements for new projects within the City. Section 12.40 contains general requirements, including a point system for specific project features and techniques in order to determine compliance with the ordinance, and defines exemptions from the ordinance. Section 12.41 sets minimum standards for water delivery systems (irrigation) to landscapes. Section 12.42 provides various regulations, of which two are applicable to stormwater management. The Heat and Glare Reduction regulation states among its purposes the design of vehicular use areas that reduce stormwater runoff and increase groundwater recharge; and the Soil and Watershed Conservation regulation is intended, among other purposes, to increase the "residence time of precipitation" within a given watershed. Implementation guidelines developed for the ordinance provide specific features and techniques for incorporation into projects, and include water management guidelines addressing runoff, infiltration, and groundwater recharge.

(iii) Section 64.70, Stormwater and Urban Runoff Pollution Control Ordinance (Ordinance No. 172,176)

In 1998, LAMC Section 64.70, the Stormwater and Urban Runoff Pollution Control Ordinance, was added by Ordinance No. 172,176, and prohibits the discharge of unauthorized pollutants in the City. This Ordinance applies to all dischargers and places of discharge that discharge stormwater or non-stormwater into any storm drain system or receiving waters. While this practice is prohibited under the County's Municipal NPDES Permit, adoption of the Ordinance allows enforcement by the Department of Public Works, as well as the levy of fines for violations. The Ordinance prohibits the discharge of pollutants by persons operating or performing industrial or commercial activities into the storm drain system and receiving waters, except as authorized by a general or separate NPDES permit; defines illicit, exempt, and conditionally exempt discharges; prohibits the placement or discharge of trash, sewage, hazardous materials, and other waste in storm drains or receiving waters, or the accumulation, storage, or disposal of these materials in such a way as to contaminate runoff discharged to these facilities; requires control of pollutants from parking lots; and prohibits illicit connections to municipal storm drain facilities.

(iv) Section 64.72, Stormwater Pollution Control Measures for Development Planning and Construction Activities

In 2000, LAMC Section 64.72, Stormwater Pollution Control Measures For Development Planning and Construction Activities, was added by Ordinance

173,494, and sets forth requirements for construction activities and facility operations of development and redevelopment projects to comply with the requirements of the NPDES permit requirements.

(v) Section 91.7013 and 91.7014, Erosion Control and Drainage Devices

Earthwork activities, including grading, are governed by the Los Angeles Building Code, which is contained in LAMC, Chapter IX, Article 1. Specifically, LAMC Section 91.7013 includes regulations pertaining to erosion control and drainage devices, and Section 91.7014 includes general construction requirements, as well as requirements regarding flood and mudflow protection.

(b) City of Los Angeles Low Impact Development Ordinance (Ordinance No. 181,899)

In November 2011, the City adopted a Citywide LID Ordinance that amends the City's existing Stormwater Ordinance (LAMC Sections 64.70.01 and 64.72, discussed above) to expand the applicability of the SUSMP requirements by imposing rainwater LID strategies on projects that require building permits. The LID Ordinance became effective on May 12, 2012, and was updated in September 2015 (Ordinance No. 183,833).

LID is a stormwater management strategy with goals to mitigate the impacts of increased runoff and stormwater pollution as close to its source as possible. LID promotes the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. The goal of these LID practices is to remove nutrients, bacteria, and metals from stormwater while also reducing the quantity and intensity of stormwater flows. Through the use of various infiltration strategies, LID is aimed at minimizing impervious surface area. Where infiltration is not feasible, the use of bioretention, rain gardens, green roofs, and rain barrels that will store, evaporate, detain, and/or treat runoff may be used.[16]

The intent of LID standards is to:

- Require the use of LID practices in future developments and redevelopments to encourage the beneficial use of rainwater and urban runoff;
- Reduce stormwater/urban runoff while improving water quality;
- Promote rainwater harvesting;
- Reduce off-site runoff and provide increased groundwater recharge;

16 City of Los Angeles Department of Public Works, Bureau of Sanitation (LASAN), Watershed Protection Division, Planning and Land Development Handbook for Low Impact Development (LID), Part B, 5th Edition, May 9, 2016.

- Reduce erosion and hydrologic impacts downstream; and
- Enhance the recreational and aesthetic values in our communities.

The Citywide LID strategy addresses land development planning, as well as storm drain infrastructure. Toward this end, LID is implemented through BMPs that fall into four categories: site planning BMPs, landscape BMPs, building BMPs, and street and alley BMPs. While the LID Ordinance and BMPs contained therein are compliant with County Municipal NPDES Permit requirements for stormwater management, those requirements apply only to proposed new development and redevelopment of a certain size, primarily address stormwater pollution prevention as opposed to groundwater recharge, and vary over time as the permit is reissued every five years. The LID Ordinance provides a consistent set of BMPs that are intended to be inclusive of, and potentially exceed, SUSMP standards, apply to existing, as well as new, development, and emphasize natural drainage features and groundwater recharge in addition to pollution prevention in receiving waters. The LID Ordinance requires the capture and management of the first 0.75 of an inch of runoff flow during storm events defined in the City's SUSMP BMPs, through one or more of the City's preferred SUSMP improvements: on-site infiltration, capture and reuse, or biofiltration/biotreatment BMPs, to the maximum extent feasible as described below.

- On-site infiltration refers to the physical process of percolation, or downward seepage, of water through a soil's pore space. As water infiltrates, the natural filtration, adsorption, and biological decomposition properties of soils, plant roots, and microrganisms work to remove pollutants prior to the water recharging the underlying groundwater. Infiltration BMPs include infiltration basins, infiltration trenches, infiltration galleries, bioretention without an underdrain, dry wells, and permeable pavement. Infiltration can provide multiple benefits, including pollutant removal, peak flow control, groundwater recharge, and flood control. However, conditions that can limit the use of infiltration include soil properties, proximity to building foundations and other infrastructure, geotechnical hazards (e.g., liquefaction, landslides), and potential adverse impacts on groundwater quality (e.g. industrial pollutant source areas, contaminated soils, groundwater plumes). To ensure that infiltration would be physically feasible and desirable, a categorical screening of site feasibility criteria must be completed prior to the use of infiltration BMPs.
- Capture and reuse refers to a specific type of BMP that operates by capturing stormwater runoff and holding it for efficient use at a later time. On a commercial or industrial scale, capture and reuse BMPs are typically cisterns, which can be implemented both above and below ground. Cisterns are sized to store a specified volume of water with no surface discharge until this volume is exceeded. The primary use of captured runoff is for subsurface drip irrigation. The temporary storage of roof runoff reduces the runoff volume from a property and may reduce the peak runoff velocity for small, frequently occurring storms. In addition, by reducing the amount of stormwater runoff flowing into a

stormwater conveyance system, fewer pollutants are transported through the conveyance system into local streams and the ocean. The on-site reuse of the stored water for non-potable domestic purposes conserves City-supplied potable water and, where directed to unpaved surfaces, can recharge groundwater in local aquifers.

- Biofiltration BMPs are landscaped systems that capture and treat stormwater runoff through a variety of physical and biological treatment processes. Biofiltration systems normally consist of a ponding area, mulch layer, planting soils, plants, and, in some cases, an underdrain. Runoff that passes through a biofiltration system is treated by the natural adsorption and filtration characteristics of the plants, soils, and microbes with which the water comes into contact. Biofiltration BMPs include vegetated swales, filter strips, planter boxes, high flow biotreatment units, bioinfiltration systems, and bioretention systems with underdrains. Biofiltration can provide multiple benefits, including pollutant removal, peak flow control, and low amounts of volume reduction through infiltration and evapotranspiration.

Per the City's 2016 LID Manual's Figure 3.3 and Section 4.1, the City's preferred LID improvement is on-site infiltration of stormwater since it allows for groundwater recharge and reduces the volume of stormwater entering municipal drains.[17] If Project Site conditions are not suitable for infiltration, the City requires on-site retention via stormwater capture and reuse. Should capture and reuse be deemed technically infeasible, high efficiency bio-filtration/bioretention systems should be utilized. Lastly, under the LID ordinance (LAMC Section 64.72 C.6), as interpreted in the LID Manual, if no single approach listed in the LID Manual is feasible, then a combination of approaches may be used.[18]

(c) City of Los Angeles Water Quality Compliance Master Plan for Urban Runoff

The Water Quality Compliance Master Plan for Urban Runoff (Water Quality Compliance Master Plan) was developed by the City's Department of Public Works, Bureau of Sanitation (LASAN), Watershed Protection Division, in collaboration with stakeholders, in response to a 2007 City Council motion (Motion 07-0663) for the development of a water quality master plan addressing pollution from urban runoff within the City. The Water Quality Compliance Master Plan was adopted in April 2009.

The Water Quality Compliance Master Plan addresses planning, budgeting, and funding for achieving clean stormwater and urban runoff for the next 20 years and presents an overview of the status of urban runoff management within the City.

17 City of Los Angeles Department of Public Works, LASAN, Watershed Protection Division, Planning and Land Development Handbook for Low Impact Development (LID), Part B, 5th Edition, May 9, 2016.

18 City of Los Angeles Department of Public Works, LASAN, Watershed Protection Division, Planning and Land Development Handbook for Low Impact Development (LID), Part B, 5th Edition, May 9, 2016.

The Water Quality Compliance Master Plan identifies the City's four watersheds; summarizes water quality conditions in the City's receiving waters as well as known sources of pollutants; summarizes regulatory requirements for water quality; describes BMPs required by the City for stormwater quality management; and discusses related plans for water quality that are implemented within the Los Angeles region, particularly TMDL Implementation Plans and Watershed Management Plans in Los Angeles.

(d) City of Los Angeles Stormwater Program

The Watershed Protection Division of LASAN is responsible for stormwater pollution control throughout the City in compliance with the Los Angeles County MS4 Permit. The Watershed Protection Division administers the City's Stormwater Program, which has two major components: Pollution Abatement and Flood Control. The Watershed Protection Division published the two-part Development Best Management Practices Handbook that provides guidance to developers for compliance with the Los Angeles County MS4 permit through the incorporation of water quality management into development planning. The Development Best Management Practices Handbook, Part A: Construction Activities (3rd edition), (September 2004) provides specific minimum BMPs for all construction activities.[19] The Planning and Land Development Handbook for LID, Part B: Planning Activities (5th edition, May 9, 2016) (LID Handbook) provides guidance to developers to ensure the post-construction operation of newly developed and redeveloped facilities comply with the Developing Planning Program regulations of the City's Stormwater Program.[20] The LID Handbook assists developers with the selection, design, and incorporation of stormwater source control and treatment control BMPs into project design plans and provides an overview of the City's plan review and permitting process.

During the development review process, project plans are reviewed for compliance with the City's General Plan, zoning ordinances, and other applicable local ordinances and codes, including stormwater requirements. Plans and specifications are reviewed to ensure that the appropriate BMPs are incorporated to address stormwater pollution prevention goals.

Operations and maintenance requirements in the LID Handbook include the following:

- Frequent inspections of the infiltration facilities shall occur to ensure that surface ponding infiltrates into the subsurface completely within the design drawdown time following storms. If vector breeding is taking place at a site as

19 City of Los Angeles Department of Public Works, LASAN, Development Best Management Practices Handbook, Part A, Construction Activities, 3rd Edition, September 29, 2004.

20 City of Los Angeles Department of Public Works, LASAN, Watershed Protection Division, Planning and Land Development Handbook for Low Impact Development (LID), Part B, 5th Edition, May 9, 2016.

a result of contained stormwater or inadequately maintained BMPs, the Greater Los Angeles County Vector Control District has the ability to fine site owners for violating the California Health and Safety Code (Section 2060 – 2067).

- Regular inspections shall take place to ensure that the pretreatment sediment removal BMP/forebay is working efficiently. Sediment buildup exceeding 50 percent of the forebay sediment storage capacity shall be removed.
- The infiltration facility shall be maintained to prevent clogging. Maintenance activities include checking for debris/sediment accumulation and removal of such debris.
- Facility soil (if applicable) shall be maintained. Flow entrances, ponding areas, and surface overflow areas shall be inspected for erosion periodically. Soil and/or mulch shall be replaced as necessary to maintain the long-term design infiltration rate for the life of the project.
- Site vegetation shall be maintained as frequently as necessary to maintain the aesthetic appearance of the site as well as the filtration capabilities (where applicable). This includes the removal of fallen, dead, and/or invasive plants, watering as necessary, and the replanting and/or reseeding of vegetation for reestablishment as necessary.
- Pervious pavement areas that are damaged or clogged shall be replaced/repaired per manufacture's recommendation as needed.
- Follow all proprietary operation and maintenance requirements.

The provisions of the LID Handbook are implemented through a Covenant and Agreement (C&A) that must be submitted, along with the design plans showing the project's stormwater measures, during the plan review and approval process. The C&A must include, as an attachment, an Operation and Maintenance (O&M) Plan describing the BMP operation and maintenance procedures, employee training program and duties, operating schedule, maintenance frequency, routine service schedule, and other activities. The O&M Plan requires a maintenance log be kept that can be inspected by the City upon request.

b) Existing Conditions

(1) Surface Water Hydrology (Drainage)

(a) Regional

The Project Site is located within the Ballona Creek Watershed (Watershed) in the Los Angeles Basin. The Watershed encompasses an area of approximately 130 square miles extending from the Santa Monica Mountains and the Ventura-Los Angeles County line on the north, to the Harbor Freeway (I-110) on the east, and to the Baldwin Hills on the south. Ballona Creek is a 9-mile-long flood protection channel that drains the Watershed to the Pacific Ocean. The major tributaries to

Ballona Creek include Centinela Creek, Sepulveda Canyon Channel, Benedict Canyon Channel, and numerous storm drains.[21] Ballona Creek flows generally southwest, ultimately discharging into the Pacific Ocean at the Santa Monica Bay, which is approximately 12 miles southwest of the Project Site. Ballona Creek is designed to discharge to Santa Monica Bay approximately 71,400 cubic feet per second (cfs) from a 50-year frequency storm event.[22]

(b) Local

The Project vicinity has a network of existing underground storm drainage facilities, owned and maintained by the City of Los Angeles, that receive surface water runoff. Within Yucca Street, there is an existing 27-inch reinforced concrete pipe (RCP) between Vine Street and Argyle Avenue that flows towards the southwest. Within Vine Street, there is an existing 24-inch RCP that flows towards the south. Within Argyle Avenue, there is an existing 12-inch vitrified clay pipe (VCP) in the alley. This 12-inch VCP flows east to Argyle Avenue and then discharges to the gutter via an outlet chamber located approximately 90 feet south of the alley. Within Ivar Avenue there is an existing 69-inch RCP that flows towards the south.[23]

The stormwater runoff from the Project Site is discharged into off-site storm drainage catch basins and underground storm drainage pipes, which convey stormwater through various underground pipe networks into Ballona Creek, ultimately discharging into the Santa Monica Bay.

(c) Project Site Overview

The approximate 4.46-acre Project Site is divided into six drainage areas[24], identified as A1, A2, and B1, B2, B3 and B4. The Project Site generally consists of impervious surface parking, buildings, and impervious pavement for pedestrian and vehicular circulation. For the purposes of this hydrologic analysis, the 4.46-acre Project Site is expanded to 4.50 acres to include the portion of the alley (B4) to the south of the East Site which would be merged into the Project Site as part of the Project. The alley is accounted for in its own drainage area under existing conditions in order to provide an accurate comparison between the pre- and post-Project conditions. The Alley consists entirely of impervious surfaces. Generally, limited pervious areas within the Project Site are located within the 1.81-acre West Site (100-percent impervious) and the 2.69-acre East Site (95.4 percent

[21] KPFF Consulting Engineers, Hollywood Center Hydrology and Water Quality Report, March 13, 2020, p. 2.

[22] KPFF Consulting Engineers, Hollywood Center Hydrology and Water Quality Report, March 13, 2020, p. 3.

[23] KPFF Consulting Engineers, Hollywood Center Hydrology and Water Quality Report, March 13, 2020, pp. 2-3.

[24] These drainage areas are determined by the drainage patterns and flow paths of stormwater that are tributary to a common point or area.

impervious). **Table IV.G-1**, *Existing Drainage Conditions*, shows the existing volumetric flow rate (measured in cfs) generated by a 50-year storm event[25] and a summary of existing imperviousness conditions for the Project Site. The existing runoff rate during a 50-year storm event, referred to as the [Q_{50}] value, on the Project Site is 14.42 cfs. As shown in Table IV.G-1, the Project Site is currently approximately 97.2 percent impervious.

TABLE IV.G-1
EXISTING DRAINAGE CONDITIONS

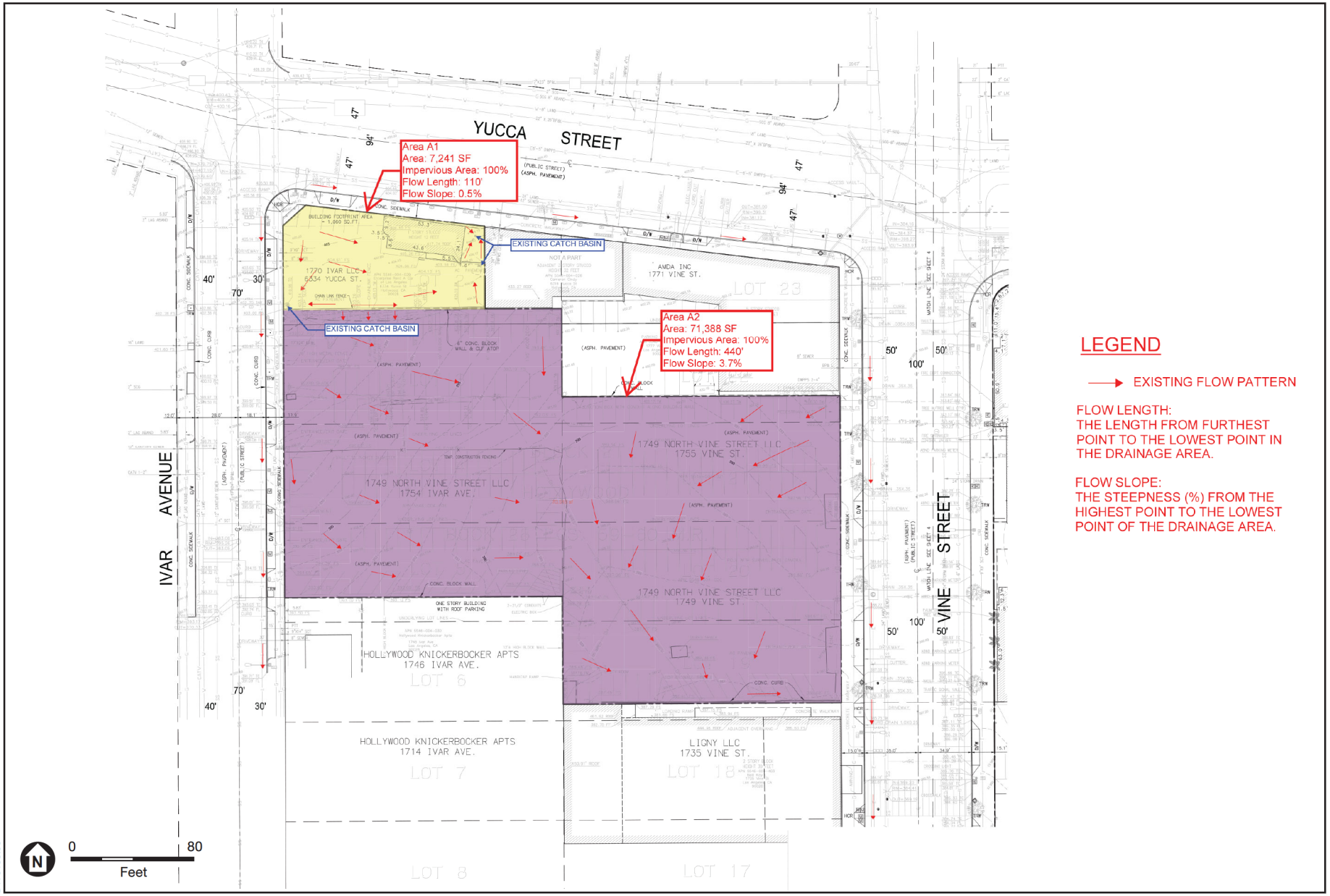
Drainage Area	Area (Acres)	Percent Imperviousness (%)	Q_{50} (cfs)
West Site			
A1	0.17	100	0.53
A2	1.64	100	5.27
Subtotals	1.81	100	5.80
East Site			
B1	0.78	100	2.50
B2	0.57	90.9	1.82
B3	1.31	94.5	4.20
B4	0.03	100	0.10
Subtotals	2.69	95.4	8.62
Total	**4.50**	**97.2**	**14.42**

SOURCE: KPFF Consulting Engineers, Hollywood Center Hydrology and Water Quality Report, March 13, 2020, p. 4.

(i) West Site

Figure IV.G-1, *Existing Site Drainage: West Site*, shows the two existing drainage areas at the West Site. As shown in Table IV.G-1 above, there are no pervious surfaces within the West Site – it is entirely developed with structures and paved surfaces. Area A1 consists of the one-story American Musical and Dramatic Academy (AMDA) storage building and surface parking lot located at the corner of Yucca Street and Ivar Avenue. There are several catch basins in the parking lot into which the stormwater is conveyed before discharging to either Yucca Street or Ivar Avenue via curb drains.[26] The building's roof drainage internally collects and discharges to Vine Street via a curb drain. Area A2 consists of a surface

25 A 50-year rainfall event has a one in 50 (two percent) chance of occurring in a given year.
26 Catch basins are reservoirs or wells into which surface water is collected.



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SOURCE: KPFF Consulting Engineers, 2019

Hollywood Center Project

Figure IV.G-1
Existing Site Drainage: West Site

(i) East Site

Figure IV.G-2, *Existing Site Drainage: East Site*, shows the three existing drainage areas at the East Site.[28] The East Site comprises a total of 2.5 percent pervious surfaces; this pervious area primarily comes from existing landscaped areas that include planted areas and trees. Area B1 consists of a surface parking lot on Vine Street, which sheet flows southwest to the gutter on Vine Street. Area B2 consists of a surface parking lot on Argyle Avenue, which sheet flows southeast to a catch basin before flowing above-ground to the alley to the south. Area B3 consists of the Capitol Records Complex and surrounding surface parking lot. The surface parking lot sheet flows southwest to a catch basin before discharging to Vine Street. The Capital Records Complex roof drainage collects internally and discharges to Yucca Street and Vine Street via curb drains. Area B4 consists of a portion of the alley to the south of the Project Site that would be merged into the Project Site.[29] The majority of the alley sheet flows towards an existing catch basin that is located in the western portion of the alley. The remainder of the alley sheet flows into the gutter in Argyle Avenue.

(i) Flooding and Inundation

The Project Site is not located within a Special Flood Hazard Area (a 100-year floodplain) or Moderate Flood Hazard Area (500-year floodplain) identified by the Federal Emergency Management Agency (FEMA) and published in the Flood Insurance Rate Maps (FIRM).[30] The areas of minimal flood hazard, which are the areas outside the Special Flood Hazard Area and higher than the elevation of the 500-year floodplain, are labeled Zone C or Zone X. The Project Site is located within Zone X and is, therefore, located outside of the 100- and 500-year floodplain.[31,32]

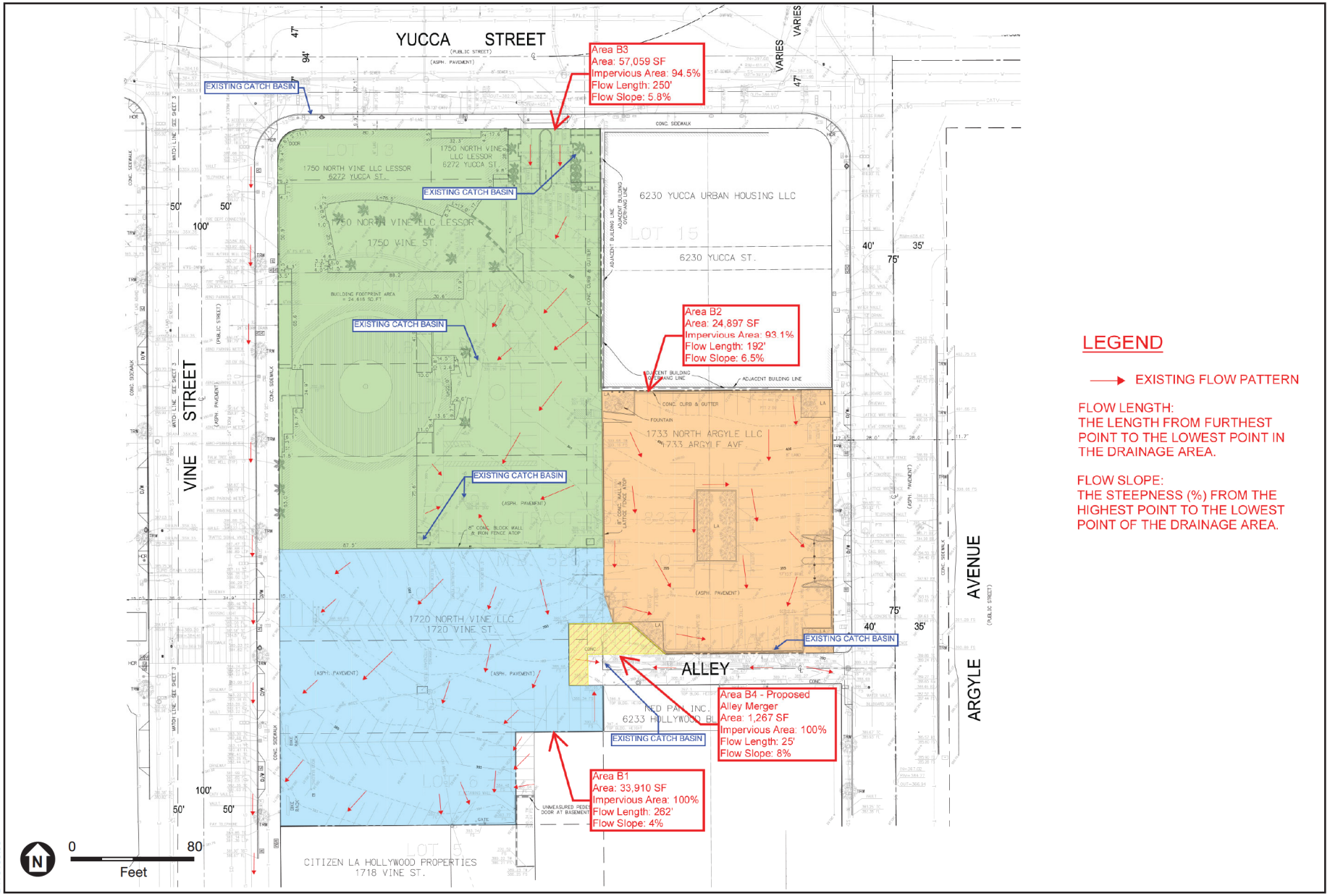
28 As previously stated, the fourth drainage area (Area B4) consists of the portion of the alley which will be merged into the Project Site.

29 KPFF Consulting Engineers, Hollywood Center Hydrology and Water Quality Report, March 13, 2020, p. 4.

30 FIRMs depict the 100-year floodplain as Zone A, Zone AO, Zone AH, Zones A1-A30, Zone AE, Zone A99, Zone AR, Zone AR/AE, Zone AR/AO, Zone AR/A1-A30, Zone AR/A, Zone V, Zone VE, and Zones V1-V30. FIRMs depict the 500-year floodplain as Zone B or Zone X. Information based on Federal Emergency Management Agency (FEMA), Flood Insurance Rate Map, https://www.fema.gov/flood-insurance-rate-map-firm, accessed April 3, 2020.

31 Based on FIRM Number 06037C1605F, effective on September 26, 2008.

32 KPFF Consulting Engineers, Hollywood Center Hydrology and Water Quality Report, March 13, 2020, p. 14.



D170105.00

SOURCE: KPFF Consulting Engineers, 2019

Hollywood Center Project

Figure IV.G-2
Existing Site Drainage: East Site

(2) Surface Water Quality

(a) Regional

As stated above, the Project Site lies within the Ballona Creek Watershed. Constituents of concern listed for Ballona Creek under California's Clean Water Act Section 303(d) List include: cadmium (sediment), chlordane (tissue & sediment), coliform bacteria, copper (dissolved), cyanide, dichloro-diphenyl-trichloroethane (DDT), lead, polynuclear aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), selenium, sediment toxicity, shellfish harvesting advisory, silver, toxicity, trash, viruses (enteric), and zinc. No TMDL data have been recorded by the USEPA for this waterbody.[33]

(b) Local

In general, urban stormwater runoff occurs following precipitation events, with the volume of runoff flowing into the drainage system depending on the intensity and duration of the rain event. Contaminants that may be found in stormwater from developed areas include sediments, trash, bacteria, metals, nutrients, organics and pesticides. The source of contaminants includes surface areas where precipitation falls, as well as the air through which it falls. Contaminants on surfaces, such as roads, maintenance areas, parking lots, and buildings, which are usually contained in dry weather conditions, may be carried by rainfall runoff into drainage systems. The City typically installs catch basins with screens to capture debris before entering the storm drain system. In addition, the City conducts routine street cleaning operations, as well as periodic cleaning and maintenance of catch basins, to reduce stormwater pollution within the City.[34]

(c) Project Site

As stated in the Hydrology Report, based on the Project survey conducted on December 20, 2017, site observations, and the fact that the existing site was developed prior to the enforcement of storm water quality BMP design, implementation, and maintenance, the Project Site currently does not implement BMPs, and there are no means of on-site treatment for stormwater runoff.[35] As stated above in Subsection 2.(b)(1), Surface Water Hydrology (Drainage), drainage from the West Site is conveyed off-site via catch basins, curb drains, and sheet flow into Yucca Street, Ivar Avenue, or Vine Street. Drainage from the East Site is conveyed off-site via catch basins, curb drains, and sheet flow into Vine Street and Yucca Street. These flows travel downstream through the City's

[33] KPFF Consulting Engineers, Hollywood Center Hydrology and Water Quality Report, March 13, 2020, p. 5.
[34] KPFF Consulting Engineers, Hollywood Center Hydrology and Water Quality Report, March 13, 2020, p. 5.
[35] KPFF Consulting Engineers, Hollywood Center Hydrology and Water Quality Report, March 13, 2020, p. 5.

municipal storm drain system and ultimately into Ballona Creek and Santa Monica Bay.

(3) Groundwater Hydrology

(a) Regional

Groundwater use for domestic water supply is a major beneficial use of groundwater basins in Los Angeles County. The City of Los Angeles overlies the Los Angeles Coastal Plain Groundwater Basin (Basin). The Basin comprises the Hollywood, Santa Monica, Central, and West Coast Subbasins. Groundwater flow in the Basin is generally south-southwesterly and in certain locations is restricted by natural geological features. Replenishment of groundwater basins occurs mainly by percolation of precipitation throughout the region via permeable surfaces, spreading grounds, and groundwater migration from adjacent basins, as well as injection wells designed to pump freshwater along specific seawater barriers to prevent the intrusion of salt water.[36] The City of Los Angeles is mostly located within the Central Subbasin, while Project Site is located within the Hollywood Subbasin.

(b) Local

The Project Site specifically overlies the northeastern portion of the Hollywood Subbasin. The Hollywood Subbasin is bounded on the north by the Santa Monica Mountains and the Hollywood fault, on the east by the Elysian Hills, on the west by the Inglewood fault zone, and on the south by the La Brea High, formed by an anticline that brings impermeable rocks close to the surface.[37]

The Los Angeles Department of Water and Power (LADWP) is the water purveyor for the City. Water is supplied to the City from three primary sources, including the Metropolitan Water District's Colorado River and Feather River supplies (57 percent of the water supplied to the City comes from the Bay Delta [48 percent] plus the Colorado River [9 percent]), snowmelt from the Eastern Sierra Nevada Mountains via the Los Angeles Aqueduct (29 percent), local groundwater from the San Fernando groundwater basin (12 percent), and recycled water (2 percent).[38] Based on the City's most current Urban Water Management Plan (UWMP), in 2014 and 2015, LADWP had an available water supply of roughly 611,800 acre-feet, with approximately 18 percent coming from local groundwater.[39] Groundwater levels in the City are maintained through an active process via spreading grounds and recharge basins. Groundwater in the Hollywood Subbasin is replenished by

[36] KPFF Consulting Engineers, Hollywood Center Hydrology and Water Quality Report, March 13, 2020, p. 6.

[37] KPFF Consulting Engineers, Hollywood Center Hydrology and Water Quality Report, March 13, 2020, p. 6.

[38] Los Angeles Department of Water and Power (LADWP): Facts and Figures.

[39] LADWP, 2015 Urban Water Management Plan, Exhibit ES-S – Service Area Reliability Assessment for Average Weather Year, adopted July 1, 2016.

percolation of precipitation and stream flow from the Santa Monica Mountains to the north. Urbanization in this area has decreased the amount of pervious surface area allowing direct percolation. Therefore, natural recharge is somewhat limited. The natural safe yield of the Hollywood Subbasin is estimated to be approximately 3,000 acre-feet per year. Groundwater flow within the Hollywood Subbasin generally flows east to west.

(c) Project Site

The Project Site is nearly entirely (97.2 percent) improved with impervious surfaces, including structures and paved surfaces (asphalt parking lots). As such, precipitation sheet flows off the Project Site with little to no percolation into underlying soils and, therefore, does not contribute to groundwater recharge.

Groundwater was encountered during recent borings conducted as part of the Geotechnical Investigation at varying depths between 49.2 and 98.3 feet below ground surface (bgs).[40] However, shallower perched groundwater may be present seasonally following rains.[41] In order to understand the depth to the groundwater table beneath the Project Site, a groundwater monitoring well was installed in Boring 3 (as referred to in the Geotechnical Investigation) for the purpose of continued observation of groundwater levels at a depth of 65 feet.

(4) Groundwater Quality

(a) Regional

As stated above, Basin falls under the jurisdiction of the LARWQCB. According to LARWQCB's Basin Plan, objectives applying to all ground waters of the region include bacteria, chemical constituents and radioactivity, mineral quality, nitrogen (nitrate, nitrite), and taste and odor.[42]

(b) Local

As stated above, the Project Site specifically overlies the Hollywood Subbasin. Based upon LARWQCB's Basin Plan, constituents of concern listed for the Hollywood Subbasin include boron, chloride, sulfate, Total Dissolved Solids, and nitrate.[43]

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40 Feffer Geological Consulting, Geotechnical Investigation for EIR, Hollywood Center Development, 1733-1741 Argyle Avenue; 6236 and 6334 West Yucca Street; 1720-1730, 1740, 1745-1760, and 1762-1770 N. Vine Street; 1746, 1748-1754, 1760, and 1764 N. Ivar Avenue, Hollywood Area City of Los Angeles, California, September 23, 2019, p. 7. Provided in Appendix G-3 of this Draft EIR.

41 California Department of Conservation, Division of Mines and Geology, Seismic Hazard Zone Report for the Hollywood 7.5-Minute Quadrangle, Los Angeles County, California, 1998.

42 KPFF Consulting Engineers, Hollywood Center Hydrology and Water Quality Report, March 13, 2020, p.7.

43 KPFF Consulting Engineers, Hollywood Center Hydrology and Water Quality Report, March 13, 2020, p.7.

(c) Project Site

Though it is possible for surface water borne contaminants to percolate into groundwater and affect groundwater quality, no appreciable infiltration of potential contaminants described above is expected to occur as the Project Site is currently 97.6 percent impervious.

(5) Inundation, Tsunami, and Seiche Hazard Areas

According to the City of Los Angeles General Plan Safety Element, Exhibit G: Inundation & Tsunami Hazard Areas, the Project Site is located in a potential dam inundation area[44] within the Hollywood Reservoir inundation area.[45] With respect to tsunami hazards, the Project Site is located approximately 12 miles inland (northeast) from the Pacific Ocean, is not located in a City-designated tsunami hazard area[46], and is at an elevation of approximately 398 feet above mean sea level (amsl).[47] Additionally, there is intervening development in all directions around the Project Site. Therefore, the Project Site is not at risk of tsunami inundation based on its proximity to the Pacific Ocean and being outside of a tsunami hazard area.

Regarding seiche hazards, the Project Site is located within the northern edge of the Hollywood Reservoir inundation area, which is located about one mile northwest of the Project Site.

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to hydrology and water quality if it would:

Threshold (a): Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality;

Threshold (b): Substantially decrease groundwater supplies or interfere substantially with groundwater recharge

44 City of Los Angeles Department of City Planning, General Plan Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas, adopted November 26, 1996.

45 City of Los Angeles Department of City Planning, General Plan Safety Element, adopted November 26, 1996, p. 59.

46 City of Los Angeles Department of City Planning, General Plan Safety Element, adopted November 26, 1996, p. 59.

47 Citadel Environmental, Phase I Environmental Site Assessment Report, Hollywood Center Project, Los Angeles, California 90028, July 30, 2018. Provided in Appendix H-1 of the Draft EIR.

such that the project may impede sustainable groundwater management of the basin;

Threshold (c): Substantially alter the existing drainage pattern of the site or area, including through 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 offsite;***
- ***iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or***
- ***iv. Impede or redirect flood flows***

Threshold (d): In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; or

Threshold (e): Conflict* with or obstruct implementation of a water quality contr*ol plan or sustainable groundwater management plan.

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions. The factors to evaluate hydrology and water quality impacts include whether the Project would:

(1) Surface Water Hydrology

- Cause flooding during the projected 50-year developed storm event which would have the potential to harm people or damage property or sensitive biological resources;
- Substantially reduce or increase the amount of surface water in a water body; or
- Result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow.

(2) Surface Water Quality

- Result in discharges that would create pollution, contamination or nuisance as defined in Section 13050 of the CWC or would cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body.

(3) Groundwater Quality

- Affect the rate or change the direction of movement of existing contaminants;
- Expand the area affected by contaminants;
- Result in an increased level of groundwater contamination (including that from direct percolation, injection or salt water intrusion); or
- Cause regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations (CCR), Title 22, Division 4, and Chapter 15 and in the Safe Drinking Water Act.

b) Methodology

The analysis in this section addresses potential Project impacts on hydrology (drainage) and surface water quality. The analysis is based, in large part, on the Hydrology Report and provided in Appendix I of this Draft EIR, and the Phase I and Phase II ESAs provided in Appendices H-1 and H-2 of this Draft EIR. A summary of the analytical methodology for hydrology and surface water quality is provided below.

(1) Hydrology (Drainage)

The analysis of potential impacts to the existing hydrologic drainage system includes a calculation of existing (pre-Project) and post-Project runoff rates during a 50-year storm event. Potential impacts to the storm drain system for this Project were analyzed by comparing the calculated existing runoff rates to the calculated post-Project runoff rates to determine the Project's effect on drainage flows. The Project's proposed on-site stormwater treatment system is evaluated for consistency with applicable regulatory measures for reducing drainage impacts.

The Project Site's drainage collection, treatment and conveyance are regulated by the City. Per the City's Special Order No. 007-1299, December 3, 1999, the City has adopted the County's Hydrology Manual as its basis of design for storm drainage facilities. The Hydrology Manual requires projects to have drainage facilities that meet the "Urban Flood" level of protection. The Urban Flood is runoff from a 25-year frequency design storm falling on a saturated watershed. A 25-year frequency design storm has a probability of 1/25 of being equaled or exceeded in any year. The 2006 L.A. CEQA Thresholds Guide, however, establishes the 50-year frequency design storm event as the threshold to analyze potential impacts

on surface water hydrology as a result of development. To provide a more conservative analysis, this report analyzes the larger storm event threshold, i.e., the 50-year frequency design storm event.

The Modified Rational Method (MODRAT) was used to calculate stormwater runoff as required by the County's Hydrology Manual. MODRAT uses the design storm and time of concentration to calculate runoff at different times throughout the storm, and allows for consideration of attenuation through channel storage, retention basins, etc., to reduce peak flows.

The County Department of Public Works has developed a time of concentration calculator, Hydrocalc, to automate time of concentration calculations as well as the peak runoff rates and volumes using the MODRAT design criteria as outlined in the Hydrology Manual. Hydrocalc was used to calculate the storm water peak runoff flow rate for the Project conditions by evaluating individual subareas (e.g., A1, A2, and B1 to B4) independent of all adjacent subareas.

For the purposes of this analysis, the 4.46-acre Project Site is slightly expanded to 4.50 acres in order to include the portion of the alley to the south of the Project Site (identified as area B4), which would be merged into the Project Site as part of the Project. The alley is accounted for in its own drainage area under existing conditions in order to provide an accurate comparison between the pre- and post-Project conditions. The alley consists entirely of impervious surfaces. These drainage areas are determined by the drainage patterns and flow paths of stormwater that are tributary to a common point or area.

(2) Water Quality

Water quality impacts were assessed by characterizing the types of pollutants and/or effects on water quality likely to be associated with temporary construction and long-term operation of the Project, Project design features that are intended to treat contaminants, and expected contaminant flows with Project implementation. Project consistency with relevant regulatory permits/requirements, including BMPs and applicable plans, is evaluated to demonstrate how compliance would reduce potential Project impacts.

Under Section 3.1.3 of the City's LID Manual, post-construction stormwater runoff from a new development must be, in order of desirability, infiltrated, captured and used, and/or treated through high efficiency on-site biofiltration/bioretention systems for at least the volume of water produced by the greater of the 85th percentile storm or the 0.75-inch storm event. In accordance with these requirements, the feasibility of the different potential BMPs outlined in the LID is evaluated in the analysis, and the required capacity of the identified preferred feasible BMP is calculated.

(3) Groundwater

Impacts to groundwater quality and groundwater level were assessed by identifying the types of pollutants and/or effects on water quality likely to be associated with construction and operation of the Project. The analysis includes a review of the existing levels, quality, direction of flow, and existing uses for the water within the Hollywood Subbasin.

Analysis of the Project impact on groundwater levels includes assessing the pre- and post-Site permeability, construction dewatering, determining the projected reduction in groundwater resources and any existing wells within a one-mile radius of the Project Site, and projecting the change in local or regional groundwater flow patterns.

(4) Water Quality and Sustainable Groundwater Management Plans

The evaluation of Project consistency with Water Quality and Sustainable Groundwater Management Plans is based on a summary of the preceding analyses of Project impacts on water quality and groundwater resources. The summary identifies the applicable plans, the regulatory mechanisms for meeting the standards in those plans and the Project characteristics that conform to those regulatory standards.

c) Project Design Features

No specific Project Design Features are proposed with regard to hydrology and water quality.

d) Analysis of Project Impacts

Construction activities, including excavation depths, building footprint, and construction methods, would be essentially the same under the Project and the Project with the East Site Hotel. Accordingly, Project-related construction impacts would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the construction impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

Although the East Senior Building under the Project with the East Site Hotel Option would be two floors shorter than under the Project, both would similarly redevelop the Project Site. This difference in building height of the East Senior Building does not materially change the analysis of hydrology and water quality impacts under the Project. Accordingly, Project operational impacts discussed in the analyses below would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the impact analysis and

impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

Threshold (a): Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

(1) Impact Analysis

(a) Construction Impacts

Construction of the Project would require grading and excavation activities on both the West and East Sites down to a maximum depth of 82 feet below existing grade for building foundations and five levels of subterranean parking. An estimated 542,300 cubic yards of soil would be excavated and exported off-site. Although not anticipated at the Project Site, any contaminated soils found would be captured within that volume of excavated material, removed from the Project Site, and remediated at an approved disposal facility in accordance with regulatory requirements.

Construction activities for the Project, such as earth moving, maintenance/operation of construction equipment, potential dewatering as described below, and handling/storage/disposal of materials, could contribute to pollutant loading in stormwater runoff. However, the Project would be required to obtain coverage under the NPDES Construction General Permit (Order No. 2009-0009-SWQ). In accordance with the requirements of the permit, the Project would require the preparation and implementation of a site-specific SWPPP that adheres to the California Stormwater Quality Association BMP Handbook. The SWPPP would specify BMPs to be used during construction. BMPs would include, but not be limited to, erosion control, sediment control, non-stormwater management, and materials management BMPs.

As previously stated, groundwater was encountered at depths ranging from 49.2 to 98.3 feet bgs during on-site investigations. Because the existing ground level drops over 20 feet across the Project Site, excavation depths for the Project will vary throughout. At Boring 3 where a groundwater monitoring well was installed, the excavation depth, which is at a maximum of 82 feet bgs from the highest existing elevation on the Project Site, would be closer to 65 feet. Based on the measurements from Boring 3, the groundwater would be approximately 48 feet below the existing ground surface. Therefore, as Project construction would require grading and excavation activities on both the West and East Sites down to a maximum depth of 82 feet bgs, it is expected that excavation in certain areas would encounter groundwater, and, therefore, dewatering would be required. Dewatering operations are practices that discharge groundwater that must be removed from a work location into the storm drain system to proceed with

construction. Discharges from dewatering operations can contain high levels of fine sediments, which, if not properly treated, could lead to exceedance of the NPDES requirements. Temporary pumps and filtration would be utilized in compliance with the NPDES permit. The temporary system would comply with all relevant NPDES requirements related to construction and discharges from dewatering operations. If dewatering is required, the treatment and disposal of the dewatered water would occur in accordance with the requirements of LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties.

In addition, the Applicant would be required to comply with the City's grading permit regulations set forth in LAMC, Chapter IX, Article 1, which include standard erosion control measures and inspections to reduce sedimentation and erosion (such measures would also be included in the construction SWPPP). Also, if construction should occur during the rainy season (October 1 to April 14), a wet weather erosion control plan (WWECP) would be prepared pursuant to the "Manual and Guideline for Temporary and Emergency Erosion Control," adopted by the City of Los Angeles Board of Public Works and incorporated into the City's Development Best Management Practices Handbook, Part A, Construction Activities, cited above, and be adopted into the facility SWPPP. As discussed above, BMPs for non-stormwater discharge management and materials management would be incorporated into the SWPPP. It is noted, however, that surface non-storm water runoff potential would be minimal, if it occurs at all.

Therefore, with compliance with NPDES requirements and City grading regulations, Project construction would not result in discharge that would cause: (1) pollution which would alter the quality of the water of the State (i.e., Santa Monica Bay) to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the water of the State by waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or (3) nuisance that would be injurious to health; affect an entire community or neighborhood, or any considerable number of persons; and occurs during or as a result of the treatment or disposal of wastes. Accordingly, construction of the Project would not result in discharges that would cause regulatory standards to be violated in the Santa Monica Bay.

During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would, therefore, require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases into groundwater. Compliance with all applicable federal, State, and local requirements concerning the handling, storage and disposal of hazardous waste, would reduce the potential for the construction of the Project to release contaminants into groundwater that could affect existing contaminants,

expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well. Implementation of the BMPs in the SWPPP in accordance with LARWQCB's discharge requirements would further ensure that any discharge of groundwater during construction would not impact groundwater quality.

As such, construction of the Project would not violate any water quality standards or waste discharge requirements. **Therefore, impacts resulting from the Project or the Project with the East Site Hotel Option construction would be less than significant with respect to surface water quality and groundwater quality.**

(b) Operational Impacts

Stormwater discharge is generated by rainfall that runs off the land and impervious surfaces, such as paved streets, parking lots, and rooftops. Stormwater discharge may include pollutants of concern, which are expected to be generated by the Project that could affect stormwater quality. During Project operation, pollutants of concern within runoff may include, but are not limited to, pollutants, such as sediment, hydrocarbons, oil, grease, heavy metals, nutrients, herbicides, pesticides, fecal coliform bacteria, and trash. This runoff can flow directly into storm drains and continue untreated. Untreated stormwater runoff degrades water quality in surface waters and groundwater and can affect drinking water, human health, and plant and animal habitats.

The existing Project Site was developed prior to the enforcement of storm water quality BMP design, implementation, and maintenance. The Project Site currently does not implement BMPs and has no means for treatment of stormwater runoff.

The Project would incorporate BMPs to ensure the treatment of first flush or the equivalent of the greater between the 85th percentile storm and first 0.75-inch of rainfall for any storm event. First, the Project would increase the amount of pervious (permeable) surface areas on the Project Site compared to existing conditions because, as discussed in Threshold (b)(1) below, the post-Project impervious areas would decrease by 10 percent compared to existing conditions, thereby reducing runoff. Under the proposed Project conditions, the Project Site would consist of three drainage areas. Each drainage area would include a stormwater capture and use system in accordance with current LID requirements that would minimize the potential for both on- and off-site erosion, siltation, and flooding. The detention would temporarily store the captured stormwater until the stored volume is entirely used through the irrigation systems. The temporary storage of runoff would reduce the runoff volume from the Project Site and would reduce the peak runoff velocity for small storms. This capture and use system would reduce the amount of stormwater runoff that flows into the stormwater conveyance systems. As a result, because there is no existing system in place at the Project Site, upon Project buildout, less pollutants would be transported through the conveyance systems into local watersheds and the ocean. Since there

are currently no existing on-site BMPs, stormwater run-off during post-Project conditions would result in improved surface water quality.

In accordance with the City's LID Ordinance, the Project would be designed such that rainfall landing on the rooftop landscaped areas would be collected by catch basin inlets and down drain outlets, which would discharge directly into the City's off-site drainage system. The collection of rainfall and discharge into the existing City system would protect the landscape areas from saturating, and the soils would provide filtration and require no further treatment. Filtration and saturation prevention potentially reduce chemicals from gardening and other occasional pollutants from contaminating groundwater.

The proposed water quality treatment features/system would be constructed pursuant to the standards established by the City of Los Angeles Watershed Protection Division to assure the treatment of contaminants without allowing seepage into the underlying soil, as required. Further, the required BMPs would be developed to avoid exceeding the standards of Section 13050 of the CWC, and, therefore, through implementation of the BMPs, the Project would meet the requirements of Division 7 (Sections 13000 – 16104) of the CWC. The final drainage and treatment system design would be finalized as part of the grading and building permit process. Proper functioning of the filtering system would require regular inspection to assure that it is not clogged or otherwise defective and is performing as expected. Maintenance may require such actions as removal and changing of mulch, changing of screen filters if used, etc. The City's Storm Water Maintenance Division has established recommended procedures for maintenance. Maintenance would be required pursuant to a covenant and agreement with the City.

Due to the incorporation of the required LID BMP(s), operation of the Project would not result in discharges that would cause: (1) pollution which would alter the quality of the waters of the State (i.e., Ballona Creek) to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the waters of the State by waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or (3) nuisance that would be injurious to health; affect an entire community or neighborhood, or any considerable number of persons; and occurs during or as a result of the treatment or disposal of wastes. Accordingly, operation of the Project would not result in discharges that would cause regulatory standards to be violated. The Project BMPs would control stormwater runoff with no increase in runoff resulting from the Project.

Source control measures under the City's LID, including good housekeeping, removal of trash and maintenance of driveways and parking areas, and proper use and storage of pesticides, would reduce surface water quality impacts and would prevent pollutants from entering the local groundwater supply by percolation into landscaped areas with permeable surfaces. Any on-site use of hazardous

materials to be used in association with operation of the Project, such as small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and pool maintenance, as well as fuel storage associated with an on-site generator, would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations such that no hazardous materials be exposed to or otherwise would adversely impact groundwater quality. Therefore, the Project would not affect or expand any potential areas of contamination, increase the level of contamination, or cause regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act.

As such, operation of the Project would not violate any water quality standards or waste discharge requirements. **Therefore, impacts resulting from the Project or the Project with the East Site Hotel operation would be less than significant with respect to surface water quality and groundwater quality.**

(2) Mitigation Measures

Impacts regarding water quality were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding water quality were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (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?

(1) Impact Analysis

(a) Construction Impacts

Construction activities for the Project would include demolition of the one-story AMDA storage building on the West Site and removal of all hardscape on the West and East Sites, excavating down to a maximum depth of 82 feet bgs on both the West and East Sites, construction of the new buildings, and installation of hardscape and landscape features on the ground level. As described above, should groundwater be encountered during construction, temporary dewatering may be required. In this instance, temporary pumps and filtration would be used in compliance with all applicable regulations and requirements. Temporary dewatering would occur during the construction of the foundations and basement levels (approximately one year) until it is able to withstand hydrostatic forces. The

system would then be turned off and the groundwater table would stabilize again after turning the system off. The dewatered water would be disposed to the public storm drainage system under the RWQCB permit and in accordance with NPDES requirements related to construction and discharges from dewatering operations. Dewatering during construction would not result in the substantial removal of groundwater that would reduce the local groundwater table. Further, dewatering would only occur temporarily during construction and would not continue post-construction. For these reasons, the Project would not impede sustainable groundwater management of the basin. **Therefore, the Project or the Project with the East Site Hotel Option construction would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin, and impacts would be less than significant.**

(b) Operational Impacts

The Project Site currently consists of 97.2 percent impervious surfaces. Most of the stormwater that enters the Project Site flows into the local stormwater system. The Project Site currently has a minimal groundwater recharge potential because low levels of stormwater percolates into the soil due to prevalence of impervious surfaces. The Project does not propose groundwater withdrawal or permanent dewatering.

With development of the Project, the amount of impervious area on the Project Site would decrease by approximately 10 percent[48] compared to existing conditions. The Project would provide ground-level landscaped areas, and water absorbed by landscaping would be reclaimed for reuse and/or discharged into the public storm drain system. The stormwater which bypasses the BMP systems would discharge to an approved discharge point in the public right-of-way. Even though there would be a 10-percent increase in permeable ground surfaces, the Project's subterranean parking would be below the redeveloped areas of the Project Site, resulting in no material change to the amount of stormwater that would percolate into the groundwater table compared to existing conditions. Therefore, pre- and post-Project infiltration volumes are considered effectively equivalent. Accordingly, there would not be a substantial reduction in groundwater recharge from current conditions, and the Project would not introduce activities that could impede sustainable groundwater management of the basin.

Furthermore, there are no existing wells or spreading grounds within one mile of the Project Site. The Project would not include new injection or supply wells and does not include the installation or operation of water wells or any extraction or recharge system that is in the vicinity of the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well or spreading ground

48 From 97.2 percent impervious surface to 87.3 percent impervious.

facility.[49] **Therefore, the Project or the Project with the East Site Hotel Option operation would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin, and impacts would be less than significant.**

(2) Mitigation Measures

Impacts regarding groundwater recharge were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding groundwater recharge were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (c): Would the Project substantially alter the existing drainage pattern of the site or area, including through 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 offsite?

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

iv. Impede or redirect flood flows?

(1) Impact Analysis

(a) Construction Impacts

(i) Erosion or Siltation On- or Off-Site

The Project would include excavation activities to a maximum depth of approximately 82 feet bgs. The Project would also result in a net export of an

[49] KPFF Consulting Engineers, Hollywood Center Hydrology and Water Quality Report, March 13, 2020, p. 16.

estimated 542,300 cubic yards of existing soil material, which would be temporarily exposed to potential erosion.

These activities could temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff.

Since the construction site would be greater than one acre, the Project would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. BMPs would be designed to reduce runoff and pollutant levels in runoff during construction. The NPDES and SWPPP measures are designed to contain and treat, as necessary, stormwater or construction watering on the Project Site so runoff does not impact off-site drainage facilities or receiving waters. Further, if the Project requires grading activities during the rainy season (October 1 through April 14), a WWECP would be prepared that would include BMPs to address potential erosion effects. Construction activities would be temporary, and flow directions and runoff volumes during construction would be controlled.

In addition, the Project would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. Thus, through compliance with all NPDES Construction General Permit requirements, including preparation of a SWPPP, implementation of BMPs, and compliance with applicable City grading regulations, the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, or flooding on- or off-site. Similarly, adherence to standard compliance measurements in construction activities would avoid flooding, substantially increasing or decreasing the amount of surface water flow from the Project Site into a water body, or a permanent, adverse change to the movement of surface water.

Therefore, the Project or the Project with the East Site Hotel Option construction would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site, and impacts would be less than significant.

(ii) Increase Rate or Amount of Surface Runoff

There are no existing stream or river courses on the Project Site that would be altered by the Project. Water would be used during the temporary construction

phases of the Project (e.g., for dust suppression). However, this water would be mechanically and precisely applied and would, in general, infiltrate the temporarily exposed soil or evaporate. **Therefore, the Project or the Project with the East Site Hotel Option construction would not substantially alter the existing drainage pattern of the Project Site or Project area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site, and impacts would be less than significant.**

(iii) Exceed Capacity of Existing or Planned Stormwater Drainage Systems

During construction-related ground disturbing activities, the pervious area on the Project Site would temporarily increase due to percolation into the soil, which would reduce off-site runoff from the Project Site. As the construction site would be greater than one acre, the Project would be required to obtain coverage under the NPDES Construction General stormwater permit. In accordance with the requirements of this permit, the Project would implement a SWPPP that specifies BMPs to be implemented during construction to manage runoff flows and avoid on- or off-site flooding. In addition, the Project would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to control runoff from the construction site and avoid on- and off-site flooding during the construction period. Lastly, construction activities and any associated hydrology (drainage) impacts would be temporary.

The Project would comply with all applicable requirements (implementation of a SWPPP, adherence to City grading requirements, etc.) during construction which would limit polluted stormwater discharges and excessive erosion and siltation from the construction site during Project construction.

Based on the above, the Project or the Project with the East Site Hotel construction would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, and impacts would be less than significant.

(iv) Impede or Redirect Flood Flows

As discussed in Subsection VI.6, Impacts Found Not to be Significant, of this Draft EIR and in the Initial Study (Appendix A) of the Draft EIR, the Project would not place housing within a 100-year flood plain as mapped on Federal Flood Hazard Boundary or Flood Insurance Rate Maps or other flood hazard delineation maps and would not impede or redirect flood flows. **Therefore, no impact would occur with respect to Threshold (c)(iv), and no further analysis is required.**

(b) Operational Impacts

(i) Erosion or Siltation On- or Off-Site

The Project Site consists of six drainage areas that include impervious surfaces, such as parking lots, buildings, and paved driveways and sidewalks. As described above in Subsection IV.G.2.b, Existing Conditions, stormwater flows are captured and conveyed in different ways based on the drainage area. Stormwater on the Project Site currently flows into catch basins, roof drains, or sheet flows to gutters in the streets.

Figure IV.G-3, *Proposed Site Drainage: West Site*, and **Figure IV.G-4**, *Proposed Site Drainage: East Site,* show the proposed drainage conditions that would occur from Project implementation.

Under proposed Project conditions, the Project Site would consist of three drainage areas.[50] Accordingly, the existing drainage patterns within each drainage area would be modified. Each drainage area would include a dedicated stormwater system that would minimize the potential for both on- and off-site erosion or siltation. **Table IV.G-2**, *Proposed Drainage Conditions* shows the proposed volumetric flow rate generated by a 50-year storm event[51] and a summary of post-Project imperviousness conditions for the 4.50-acre Project Site.

TABLE IV.G-2
PROPOSED DRAINAGE CONDITIONS

Drainage Area	Area (Acres)	Percent Imperviousness (%)	Proposed Q_{50} (cfs)	Existing Total Q_{50} (cfs)[a]	Project Comparison to Existing Q_{50} (cfs)
West Site					
A1	1.81	83.0	5.77	5.80	-0.03
East Site					
B1	1.62	88.1	5.17		
B2	1.07	93.3	3.43		
Subtotals	2.69	90.3	8.60	8.62	-0.02
Total	**4.50**	**87.3**	**14.37**	**14.42**	**-0.05**

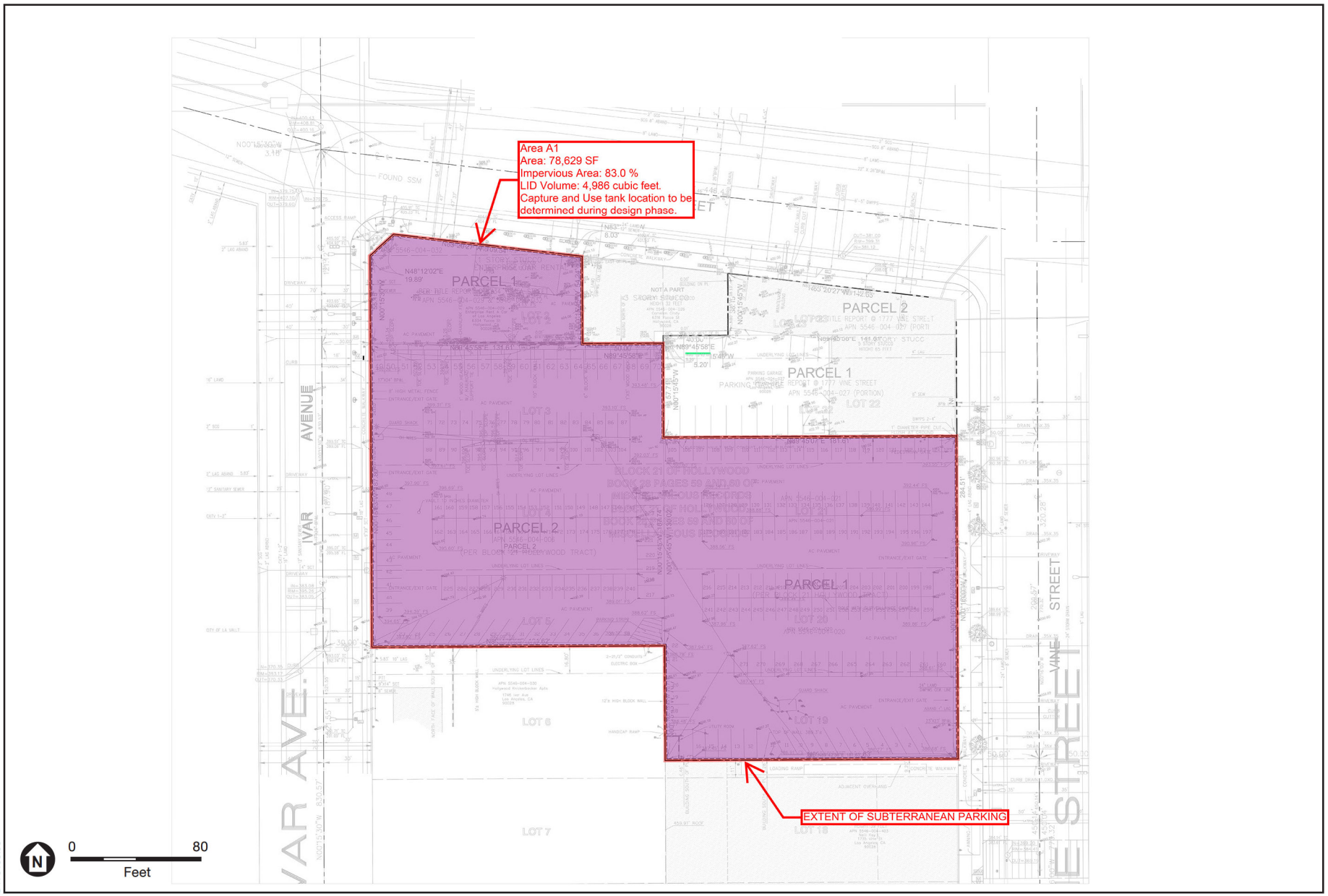
Notes:

[a] Existing total Q_{50} presented in Table IV.G-1.

SOURCE: KPFF Consulting Engineers, Hollywood Center Hydrology and Water Quality Report, March 13, 2020, p. 13.

50 The drainage areas are determined by the drainage patterns and flow paths of stormwater that are tributary to a common point or area.

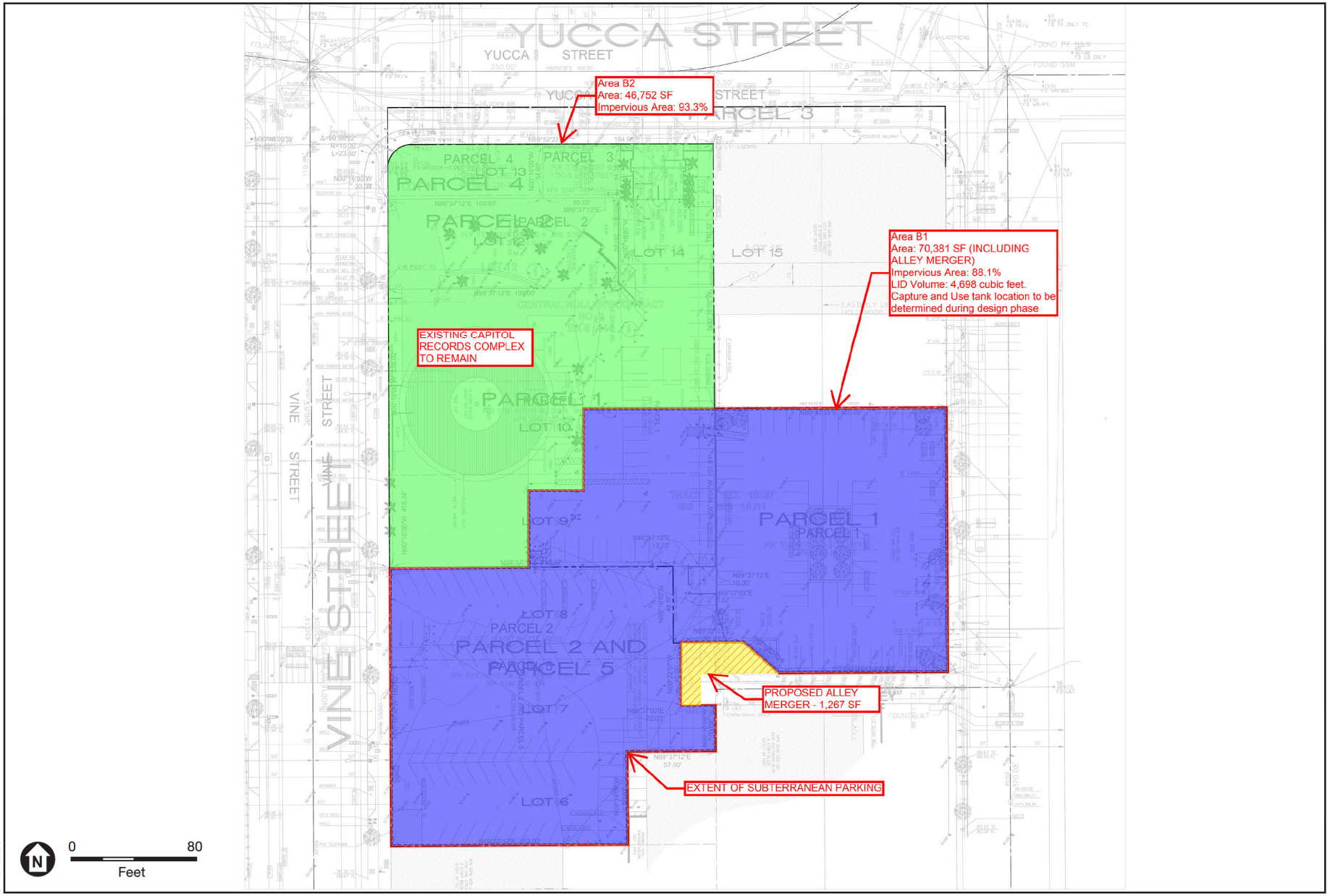
51 A 50-year rainfall event has a one-in-50 (two-percent) chance of occurring in a given year.



SOURCE: KPFF Consulting Engineers, 2020

Hollywood Center Project

Figure IV.G-3
Proposed Site Drainage: West Site



SOURCE: KPFF Consulting Engineers, 202000

Hollywood Center Project

Figure IV.G-4
Proposed Site Drainage: East Site

Area A1 would consist of the entire West Site. Area B1 would consist of the proposed building footprint on the East Site. Area B2 consists of the portion of the Capitol Records Complex that would not be modified as part of the Project.

Comparing the existing drainage conditions in Table IV.G-1 to the proposed drainage conditions in Table IV.G-2, the 50-year peak flow rate of stormwater runoff from the Project Site would decrease from 14.42 cfs to 14.37 cfs (a 0.05-cfs or 0.3-percent reduction). The overall volume of stormwater runoff from the Project Site discharged to the municipal storm drain system would decrease compared to existing conditions, as a result of the reduction in imperviousness on the Project Site.

Compliance with the LID requirements for the Project Site would ensure proper stormwater treatment with post-construction BMPs that are required to control pollutants associated with storm events up to the 85th percentile storm event consistent with the City's Stormwater Program. As such, Project BMPs would control stormwater runoff and result in an overall minor reduction in stormwater runoff from existing conditions. In order to meet the LID requirements, it is estimated that a total of 9,684 cubic feet (cf) of stormwater would need to be captured on-site; 4,986 cf at the West Site and 4,698 cf at the East Site.[52] The East Site does not include Area B2, which as previously mentioned, consists of the portion of the Capitol Records Complex that would not be modified as part of the Project, and its runoff would continue to sheet flow southwest to catch basins and discharge to Yucca and Vine Streets. To achieve this design capture volume, as infiltration is not feasible for the Project Site, the Applicant would install a capture and reuse system, in compliance with the City's LID requirements, on each site. The system is likely to be a cast-in-place concrete tank with pretreatment system located upstream. Pretreatment systems that may be used includes hydrodynamic separators and/or downspout filters. The detention would temporarily store the captured stormwater until the stored volume is entirely used through the irrigation systems. An overflow will be provided to convey stormwater exceeding the 85th percentile to the curb face.

As part of the LID requirements for the Project, to manage post-construction stormwater runoff, the Project would include the installation of building roof drain downspouts, area drains, and planter drains throughout the Project Site to collect roof and site runoff and direct stormwater away from buildings through a series of storm drain pipes. This on-site stormwater conveyance system would serve to prevent on-site flooding and pooling water on the Project Site.

As mentioned above, the volume of stormwater runoff would be reduced compared to existing conditions with implementation of the Project. The proposed LID BMPs would improve the quality of stormwater runoff leaving the Project Site. **Therefore, the Project or the Project with the East Site Hotel Option operation would not**

52 KPFF Consulting Engineers, Hollywood Center Hydrology and Water Quality Report, March 13, 2020, p. 13.

substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site, and impacts would be less than significant.

(ii) Increase Rate or Amount of Surface Runoff

As discussed above, as part of the LID requirements of the Project, to manage post-construction stormwater runoff, the Project would install of building roof drain downspouts, catch basins, and planter drains to collect roof and site runoff and direct stormwater away from buildings via a series of underground storm drain pipes. This on-site stormwater conveyance system, together with the LID BMPs that would capture and treat the first flush of rainfall, would serve to prevent on-site and off-site flooding on the Project Site and, at the same time, would ensure runoff discharged from the Project Site does not place substantial extra pressure on the municipal stormwater infrastructure during a larger storm event.

The 50-year peak flow rate of stormwater runoff from the 4.50-acre Project Site upon buildout would decrease slightly due to the reduction in impervious surfaces compared to existing conditions. Additionally, the Project's on-site stormwater conveyance system and LID BMPs would further reduce the amount of stormwater runoff. Therefore, the volume of stormwater runoff from the Project Site requiring conveyance by the municipal storm drain system would decrease under the Project. As stated under Threshold (a), stormwater runoff in excess of the volume captured, stored, and infiltrated on-site would be discharged off-site and conveyed into the municipal storm drain system and from there into the Santa Monica Bay, as under existing conditions.

Therefore, the Project or the Project with the East Site Hotel Option operation would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site, and impacts would be less than significant.

(iii) Exceed capacity of existing or planned stormwater drainage systems

As discussed above under Threshold (c)(ii) and shown in Figures IV.G-3 and IV.G-4, Project Site runoff patterns would be slightly altered as the result of Project implementation (including BMPs), as the required first flush runoff would be captured and reused on-site. Runoff in excess of the volume captured, stored, and infiltrated by the LID BMP system would be discharged off-site and would continue to be directed into the municipal storm drain system, as discussed under Threshold (a). Required on-site drainage infrastructure would be designed in accordance with City requirements, would be subject to approval by the City's Department of Public

Works, and would safely convey stormwater from the Project Site to the municipal storm drain system.

The on-site stormwater conveyance system, together with LID BMPs that would capture and treat the first flush of rainfall, would serve to prevent on-site flooding on the Project Site and, at the same time, would ensure runoff discharged from the Project Site would not exceed the capacity of the municipal stormwater infrastructure during a larger storm event. Therefore, no new off-site storm drainage infrastructure is required or proposed.

With respect to impact on water quality, as discussed under Threshold (a), implementation of LID BMPs following Project implementation would substantially improve the quality of stormwater runoff discharged from the Project Site compared to existing conditions since there are no LID BMPs currently in use at the Project Site. LID BMPs would take advantage of the natural adsorption (physical, biological, and chemical binding), biodegradation, and filtration characteristics of vegetated swales and pervious surfaces and would direct stormwater flows through soil and/or planting media prior to infiltrating into the ground below. The biofiltration system design would meet all applicable regulatory requirements for protection of water quality and the control of discharge from the Project Site.

In addition, as described above, as part of the LID requirements for the Project to manage post-construction stormwater runoff, the Project would include the installation of catch basins, planter drains, and building roof drain downspouts throughout the Project Site to collect roof and site runoff and direct stormwater away from structures through a series of underground storm drain pipes. This on-site stormwater conveyance system would serve to prevent on-site flooding on the Project Site. In addition, with implementation of the proposed LID BMPs, the volume of water leaving the Project Site would be further reduced compared to existing conditions.

Based on the above, the Project or the Project with the East Site Hotel Option operation would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, and impacts would be less than significant.

(iv) Impede or Redirect Flood Flows

As discussed in Subsection VI.6, Impacts Found not to be Significant, of this Draft EIR and in the Initial Study (Appendix A) of the Draft EIR, the Project would not place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Maps or other flood hazard delineation maps and would not impede or redirect flood flows. **Therefore, no impact would occur with respect to Threshold (c)(iv), and no further analysis is required.**

(2) Mitigation Measures

Impacts on existing drainage patterns that would cause increased siltation and flooding on- or off-site, create or contribute to the exceedance of the existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, or impede or redirect flood flows were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts on existing drainage patterns that would cause increased siltation and flooding on- or off-site, create or contribute to the exceedance of the existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, or impede or redirect flood flows were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (d): Would the Project risk release of pollutants due to project inundation by flooding, tsunami, or seiche?

(1) Impact Analysis

As mentioned above in Subsection (b)(1)(c)(iii), the Project Site is not located within a 100-year floodplain and as such, is not subject to significant flooding hazards which could result in the release of pollutants due to Project Site inundation.

A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant disturbance undersea, such as a tectonic displacement of sea floor associated with large, shallow earthquakes. With respect to tsunami hazards, the Project Site is located approximately 12 miles inland (northeast) from the Pacific Ocean, is not located in a City-designated tsunami hazard area,[53] and is at an elevation of approximately 398 feet amsl.[54] Additionally, there is intervening development in all directions around the Project Site. Therefore, the Project Site is not at risk of tsunami inundation based on its proximity to the Pacific Ocean and being outside of a tsunami hazard area. Thus, there would be no potential for risk of release of pollutants due to inundation by tsunami.

A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. The Project Site is located

53 City of Los Angeles Department of City Planning, General Plan Safety Element, adopted November 26, 1996, p. 59.

54 Citadel Environmental Services, Inc., Phase I Environmental Site Assessment Report, Hollywood Center Project, Los Angeles, California 90028, July 30, 2018. Provided in Appendix H-1 of the Draft EIR.

approximately one mile from the Hollywood Reservoir. Given the distance to the Hollywood Reservoir, any oscillation and subsequent release of water within the reservoir as part of a seiche would not inundate the Project Site. Thus, there would be no potential for risk of release of pollutants due to inundation by seiche.

The Project Site is located within the Hollywood Reservoir inundation area.[55] The Hollywood Reservoir is operated and maintained by LADWP. Dam safety regulations are the primary means of reducing damage or injury due to inundation occurring from dam failure. The California Department of Water Resources, Division of Safety of Dams, regulates the siting, design, construction, and periodic review of all dams in the State. If a breach were to occur at the reservoir, flood water would disperse over a large area where water flows would be redirected by intervening development and changes in topography. Reservoir water, were it to reach the Project Site, would generally flow along roadways adjacent to or within the vicinity of the Project Site.

Additional measures to ensure dam safety and to prevent dam failure include seismic retrofits and other related dam improvements completed under the requirements of the National Dam Safety Program.[56] The City's Local Hazard Mitigation Plan,[57] which was adopted in July 2011 and revised in August 2017, provides a list of existing programs, proposed activities and specific projects that may assist the City of Los Angeles in reducing risk and preventing loss of life and property damage from natural and human-caused hazards, including dam failure. The Hazard Mitigation Plan evaluation of dam failure vulnerability classifies dam failure as a moderate risk rating. Regardless, the Project would actively maintain the Project Site with its stormwater management system and regular implementation of BMPs to minimize pollutants within the Project Site in compliance with applicable regulatory requirements. The nature of pollutants would be typical of other developments within the dam inundation area. Thus, in the unlikely event of on-site inundation, the Project would not result in the release of significant types or quantities of pollutants.

Therefore, the Project or the Project with the East Site Hotel Option would not result in significant risk of release of pollutants to inundation by flooding, tsunami, or seiche, and impacts would be less than significant.

55 California Depart. of Water Resources, Division of Safety of Dams, Dam Inundation Map for Mulholland Dam, https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2, accessed March 15, 2020.

56 FEMA, National Dam Safety Program, https://www.fema.gov/national-dam-safety-program, accessed December 5, 2018.

57 City of Los Angeles Emergency Management Department, Local Hazard Mitigation Plan, August 2017.

(2) Mitigation Measures

Impacts regarding the release of pollutants due to project inundation by flooding, tsunami, or seiche were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding the release of pollutants due to project inundation by flooding, tsunami, or seiche were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (e): Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

(1) Impact Analysis

As discussed in Subsection IV.G.2.a, Regulatory Framework, and elaborated upon in the subsequent impact analyses, the Project falls within the jurisdiction of water quality plans with related regulations and permitting requirements that assure that development projects are in compliance with clean water policies. Most notably, the Project falls under the jurisdiction of the LARWQCB (Region 4) Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties and the Ballona Creek EWMP, and the RWQCB is also given authority to issue waste discharge requirements, enforce actions against stormwater discharge violators, and monitor water quality. In California, the NPDES stormwater permitting program is administered by the SWRCB, and the County of Los Angeles and the City are two of the Co-Permittees under the Los Angeles County NPDES MS4 Permit and, as such, are required to implement development planning guidance and control measures regarding water quality impacts from new development.

The Los Angeles County MS4 Permit contains provisions for implementation and enforcement of the SQMP and includes a LID Plan that designates BMPs that must be used by projects to address water infiltration, filtering, treatment and peak-flow discharge. The City supports the requirements of the Los Angeles County MS4 Permit through the City's LID Handbook, which provides guidance to developers of newly developed projects for compliance with regulatory standards. The Project is also within the jurisdiction of the Water Quality Compliance Master Plan for Urban Runoff, which was developed by the City's Department of Public Works and includes within its provisions the description of BMPs required by the City for stormwater quality management.

The Project would incorporate into its design an on-site drainage system that would meet regulatory requirements of the applicable plans for the protection of water resources. The Project would install a capture and reuse system, in compliance

with the City's LID requirements, on each site. The detention would temporarily store the captured stormwater until the stored volume is entirely used through the irrigation systems. The on-site drainage system would also provide BMPs in accordance with the City's LID requirements.

The Project's potential impacts regarding water quality are evaluated under Threshold (a) above. As indicated in that analysis, with the implementation of the Project's on-site drainage system, the Project would have less-than-significant impacts on both surface and groundwater quality during construction and operation phases. The Project's potential impacts regarding groundwater supplies and groundwater recharge are evaluated under Threshold (b) above. As indicated, the Project would have a less-than-significant impact. As further indicated in those analyses, with Project implementation, the stormwater runoff quality would be improved as compared to existing conditions.

Therefore, in conjunction with the implementation of necessary BMPs to support the applicable plans, the Project or the Project with the East Site Hotel Option would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and impacts would be less than significant.

(2) Mitigation Measures

Impacts regarding conflicts with or obstructing the implementation of a water quality control plan or sustainable groundwater management plan were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding conflicts with or obstructing the implementation of a water quality control plan or sustainable groundwater management plan were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

Construction activities, including excavation depths, building footprint and construction methods, would be essentially the same under the Project and the Project with the East Site Hotel Option. Accordingly, cumulative construction impacts would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the cumulative construction impact analysis and impact significance for the Project presented below are the same and also apply to the Project and the Project with the East Site Hotel Option.

Although the East Senior Building under the Project with the East Site Hotel Option would be two floors shorter than under the Project, both would similarly redevelop the Project Site. Accordingly, cumulative operational impacts would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the cumulative operational impact analysis and impact significance presented below are the same and also apply to the Project and the Project with the East Site Hotel Option.

(1) Impact Analysis

As identified in Chapter III, *Environmental Setting*, of this Draft EIR, there are 150 related projects within a two-mile radius of the Project Site. Related projects within the City of West Hollywood will be subject to their own regulations related to hydrology and water quality.

As with the Project, the related projects are located within the highly urbanized area of Hollywood and the surrounding vicinity, which include mostly hard-surface project sites. Accordingly, the potential for the related projects to generate a substantial amount of new impermeable surfaces is limited. The related projects would also be subject to the same regulatory requirements as the Project, including, where applicable, the NPDES/Waste Discharge Requirements permits discussed above and the City's LID Ordinance, which would require the related projects to capture and manage their stormwater in accordance with City's LID Guidelines. LASAN would also review each future development project on a case-by-case basis to ensure that sufficient local and regional drainage capacity is available to accommodate the project's stormwater runoff. Accordingly, the related projects are not anticipated to result in cumulatively considerable impacts with respect to hydrology and drainage quantities/patterns. Moreover, as shown above, the Project would not significantly alter or increase stormwater flows from the Project Site or alter drainage patterns in the area. **As such, the Project's or the Project with the East Site Hotel Option's contribution to cumulative impacts would not be cumulatively considerable. As such, cumulative impacts on hydrology and drainage patterns would be less than significant.**

All related projects that anticipate new construction have the potential to contribute to pollutant loading during construction and operation, which could potentially result in cumulative impacts to water quality. However, as with the Project, all new construction would be subject to NPDES Waste Discharge Requirements permits for both construction and, where applicable, dewatering activities. Each related project greater than one acre in size would be required to develop a SWPPP for construction and grading activities. In addition, all new construction plans would be evaluated individually to determine the appropriate BMPs and treatment measures to minimize the related projects impacts to water quality. Operation of the related projects would also be subject to applicable LID requirements, including implementation of operational BMPs to address the quality of water runoff from surfaces, such as driveways, parking lots, and parking structures. Pursuant to the

City's LID Ordinance, related projects would be required to implement LID BMPs through one or more of the City's preferred improvements, including on-site infiltration, capture and reuse, or biofiltration/biotreatment BMPs, to the maximum extent feasible. As described above, the Project would implement LID BMPs in addition to source control and treatment control BMPs, consistent with applicable regulatory requirements, that would ensure less than significant Project impacts on surface water and groundwater quality. With compliance to existing applicable regulations, such as the City's LID Ordinance requirements, the related projects would also be unlikely to cause or increase surface or groundwater contamination. In cases where the related projects would require dewatering during excavation, groundwater dewatering, treatment and disposal would be conducted in accordance with the LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. Compliance with these regulations would ensure less-than-significant effects on surface water, as well as groundwater quality. **Therefore, with adherence to applicable regulations, the Project's or the Project with the East Site Hotel Option's contribution to cumulative impacts would not be cumulatively considerable. As such, cumulative impacts on water quality would be less than significant.**

Furthermore, as demonstrated above, through compliance with applicable regulatory requirements via site-specific drainage systems and storm water management and BMPs, the Project and related projects would not substantially conflict with or obstruct implementation of a water quality control plan. Also, as discussed above, given the urbanized nature of Hollywood and surrounding area, the potential for the related projects to generate a substantial amount of new impermeable surfaces and thereby affecting the groundwater table is limited. None of the related projects are known to include significant quantities of permanent, ongoing groundwater withdrawal, but some would include infiltration as a means of LID compliance, where feasible and possible**. Accordingly, with these considerations, the Project's or the Project with the East Site Hotel Option's contribution to cumulative impacts would not be cumulatively considerable. As such, cumulative impacts on conflicts with or obstructing implementation of a water quality control plan or sustainable groundwater management plan would be less than significant.**

With regards to pollutant releases during flooding, the Project Site and the areas immediately surrounding the Project Site are not located within a 100-year floodplain and would not increase runoff or change drainage patterns that would result in off-site flooding. **As such, the Project or the Project with the East Site Hotel Option's would not be cumulatively considerable. As such, cumulative impacts with respect flooding would be less than significant**

The Project Site and related project sites are not located within a City-designated tsunami hazard area. The Project, in and of itself, would have no effect on seiches occurring at the Hollywood Reservoir and would not be subject to such hazards.

Other related projects may also be located within the designated Hollywood Reservoir inundation area. However, as discussed above, numerous dam safety regulations are in place to safeguard against dam failure. If a breach were to occur at the reservoir, flood water would disperse over a large area where water flows would be redirected by intervening development and changes in topography. Reservoir water, were it to reach the Project Site, would generally flow along roadways adjacent to or within the vicinity of the Project Site. Regardless, the Project and related projects would actively maintain their respective project sites with their own stormwater management systems and regular implementation of BMPs to minimize pollutants within those sites in compliance with applicable regulatory requirements. The nature of pollutants at the related project sites would be typical of other developments within the dam inundation area. Thus, in the unlikely event of on-site inundation, the Project and related projects would not result in the release of significant types or quantities of pollutants. **Based on the above, the Project's or the Project with the East Site Hotel Option's contribution to cumulative impacts would not be cumulatively considerable. As such, cumulative impacts with respect to release of pollutants due to inundation by flooding, tsunami, or seiche would be less than significant.**

Overall, based on the above, the Project's or the Project with the East Site Hotel Option's contribution to cumulative impacts would not be cumulatively considerable. As such, cumulative impacts on hydrology and water quality would be less than significant.

(2) Mitigation Measures

Cumulative impacts regarding hydrology and water quality were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Cumulative impacts regarding hydrology and water quality were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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IV. Environmental Impact Analysis

H. Land Use and Planning

1. Introduction

Development on the Project Site is controlled and guided by policies and regulations set forth in local and regional plans as well as local zoning regulations. This section of the Draft EIR analyzes the Project's consistency with applicable land use plans, laws, regulations, and policies that have been adopted for the purpose of avoiding or mitigating an environmental effect.

Evaluation of specific policies set forth in SCAG's 2016–2040 RTP/SCS and the City of Los Angeles General Plan Framework Element (Framework Element), Hollywood Community Plan, and Hollywood Redevelopment Plan are provided in tables contained in Appendix J*, Land Use Plans and Policies: Project Consistency Tables*, of this Draft EIR. Policies and regulations related to other environmental topics are also addressed in other sections of this Draft EIR. Section IV.A, *Aesthetics*, of this Draft EIR addresses policies and regulations related to the visual environment; Section IV.B, *Air Quality*, addresses relevant air quality plans and policies; Section IV.J, *Population and Housing*, addresses the amount of development that would occur relative to growth projections and planned development capacity; Section IV.K.4, *Parks and Recreation*, describes regulations regarding open space and park requirements; Section IV.L, *Transportation*, discusses the circulation system, including transit, roadway, bicycle and pedestrian facilities; and Chapter VI, *Other CEQA Considerations*, addresses issues pertaining to growth inducement (for informational purposes).

2. Environmental Setting

a) Regulatory Framework

(1) Regional or State

(a) Southern California Association of Governments Regional Transportation Plans/Sustainable Communities Strategy

The Southern California Association of Governments (SCAG) is the federally designated Metropolitan Planning Organization (MPO) with responsibilities pertaining to regional planning issues for the following six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura and Imperial. SCAG is a joint powers agency and its mandated responsibilities include developing plans and policies addressing the region's population

growth, transportation programs, air quality, housing, land use, sustainability, and economic development.

On April 7, 2016, SCAG's Regional Council adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS).[1] The 2016–2040 RTP/SCS presents a transportation vision for the region through the year 2040 and provides a long-term investment framework for addressing the region's transportation and related challenges. The 2016–2040 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG's transportation planning, and the provision of services by other regional agencies. (See Section IV.J, *Population and Housing*, for additional discussion of SCAG's 2016–2040 RTP/SCS projections.) The 2016–2040 RTP/SCS includes goals and policies that pertain to economic development, mobility, accessibility, travel safety, productivity of the transportation system, protection of the environment and health through improved air quality, energy efficiency, and land use and growth patterns that complement the State and region's transportation investments, and security of the regional transportation system. The Project Site is located within a High Quality Transit Area (HQTA), which is defined as a generally walkable transit village or corridor that is within a half mile of fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes or less during peak commute hours.[2] Local jurisdictions are encouraged to focus housing and employment growth within HQTAs.

(b) Air Quality Management Plan

The South Coast Air Quality Management District (SCAQMD), which was established in 1977 pursuant to the Lewis-Presley Air Quality Management Act, is responsible for ensuring that air quality in the South Coast Air Basin (Basin) conforms with federal and State air pollution standards. The SCAQMD is also responsible for monitoring ambient air pollution levels throughout the Basin and for developing and implementing attainment strategies to ensure that future emissions will be within federal and State standards. The SCAQMD's Air Quality Management Plan (AQMP) presents strategies for achieving the air quality planning goals set forth in the Federal and California Clean Air Acts (CCAA), including a comprehensive list of pollution control measures aimed at reducing emissions.[3] Additional discussion of the AQMP, and Project consistency with the AQMP, is addressed in Section IV.B, *Air Quality*, of this Draft EIR.

1 Southern California Association of Governments (SCAG), *2016–2040 Regional Transportation Plan/ Sustainable Communities Strategy (2016–2040 RTP/SCS)*, 2016.

2 Southern California Association of Governments (SCAG), *2016–2040 Regional Transportation Plan/ Sustainable Communities Strategy (2016–2040 RTP/SCS)*, 2016, Exhibit 5.1, p. 77.

3 South Coast Air Quality Management District (SCAQMD), *Final 2016 Air Quality Management Plan (AQMP)*, March 2017, https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15, accessed July 23, 2018.

(c) California Green Building Standards (CALGreen) Code

Part 11 of the Title 24 Building Energy Efficiency Standards is referred to as the California Green Building Standards (CALGreen) Code. The purpose of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality."[4] As of January 1, 2011, the CALGreen Code is mandatory for all new buildings constructed in the State. The CALGreen Code establishes mandatory measures for new residential and non-residential buildings. Such mandatory measures include energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality. The CALGreen Code was most recently updated in 2016 to include new mandatory measures for residential and nonresidential uses; the new measures took effect on January 1, 2017.[5]

(2) Local

(a) City of Los Angeles General Plan

California law requires that every city and county prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic goals. As stated in Section 65302 of the California Government Code, "The general plan shall consist of a statement of development policies and shall include a diagram or diagrams and text setting forth objectives, principles, standards, and plan proposals."

The City of Los Angeles General Plan (General Plan) sets forth goals, objectives, policies, and programs to provide an official guide to the future development of the City, while integrating seven state-mandated elements: Land Use, Circulation, Housing, Conservation, Open Space, Safety, and Noise. The City's General Plan also includes an Air Quality Element, which is described in Section IV.B, *Air Quality*, of this Draft EIR. Other elements of the General Plan include the Framework Element, Health and Wellness Element (Plan for a Healthy Los Angeles), and the Land Use Element (in the form of the Hollywood Community Plan), which provides further policy guidance at the community level.

(i) General Plan Framework Element

The Framework Element establishes the conceptual basis for the City's General Plan. The Framework Element sets forth a Citywide comprehensive long-range growth strategy and establishes Citywide policies regarding land use, housing, urban form and neighborhood design, open space and conservation, economic development,

4 California Building Standards Commission, *2010 California Green Building Standards Code*, 2010.

5 California Building Standards Commission, 2016 CALGreen (Part 11 of Title 24), http://www.bsc.ca.gov/Home/CALGreen.aspx, accessed December 2018.

transportation, infrastructure and public services. Framework Element land use policies are further refined through policies contained in Community Plans and Specific Plans for specific geographic areas.

The Land Use chapter of the Framework Element designates Districts (i.e., Neighborhood Districts, Community Centers, Regional Centers, Downtown Centers, and Mixed-Use Boulevards) and provides policies applicable to each District to support the vitality of the City's residential neighborhoods and commercial districts. The Project Site is located in a part of Hollywood that is designated as a "Regional Center" which is designated as a high-density area, and a focal point of regional commerce, identity, and activity. The Regional Center designation will generally allow development with floor area ratios (FAR) from 1.5:1 to 6:1, characterized by 6- to 20-story (or higher) buildings.[6,7]

Table 3-1 of the Framework Element's Land Use chapter lists the following as typical land use standards and development characteristics within a Regional Center:[8]

- Corporate and professional offices, retail commercial (including malls), offices, personal services, eating and drinking establishments, telecommunications centers, entertainment, major cultural facilities, commercial overnight accommodations, and similar uses;
- Mixed-use structures integrating housing with commercial uses;
- Multi-family housing (independent of commercial);
- Major transit hub; and
- Inclusion of small parks and other community-oriented activity facilities.

The development of sites and structures integrating housing with commercial uses is encouraged in Regional Centers, in concert with supporting services, recreational uses, open space, and amenities.[9] The density of Regional Centers also supports the development of a comprehensive and inter-connected network of public transit and services.[10]

The Housing chapter of the Framework Element states that housing production has not kept pace with the demand for housing. According to the Housing Chapter, the City has insufficient vacant properties to accommodate the projected population growth and the supply of land zoned for residential development is the most constrained in the context of population growth forecasts. Therefore, new residential development will require the recycling and/or intensification of existing developed properties. As further indicated in

6 City of Los Angeles Department of City Planning, *General Plan Framework Element*, Figure 3-1, Long Range Land Use Diagram, Metro, July 27, 1995.

7 In the City of Los Angeles, floor area ratio (FAR) is based on the "net" lot size, or the lot area minus the required setbacks. The FAR is calculated by dividing the total developed floor area by the "net" lot size.

8 City of Los Angeles Department of City Planning, *General Plan Framework Element*, Table 3-1, Land Use Standards, July 27, 1995, p. 3-13.

9 City of Los Angeles Department of City Planning, *General Plan Framework Element*, July 27, 1995, p. 3-24.

10 City of Los Angeles Department of City Planning, *General Plan Framework Element*, July 27, 1995, p. 3-25.

the Housing Chapter, the intensification of both commercial and residential development, which has occurred in the City, has been at the expense of the integrity and character of existing residential neighborhoods. A balance is required between the need to produce new housing units for all income levels and the desire to conserve the livability and character of existing neighborhoods. The housing goals indicate that the City must strive to meet housing needs of the population in a manner that contributes to stable, safe, and livable neighborhoods, reduces conditions of overcrowding, and improves access to jobs and neighborhood services.[11]

The Urban Form and Neighborhood Design chapter of the Framework Element establishes the goal of creating a livable city for existing and future residents; a city that is attractive to future investment; and a city of interconnected, diverse neighborhoods that builds on the strength of those neighborhoods and functions at both the neighborhood and citywide scales. "Urban form" is defined as "the general pattern of building height and development intensity" and the structural elements that define the City physically, such as natural features, transportation corridors, activity centers, and focal elements. "Neighborhood design" refers to the physical character of neighborhoods and communities within the City. The Framework Element does not directly address the design of individual neighborhoods or communities but embodies generic neighborhood design and implementation programs that guide local planning efforts and lay a foundation for the updating of community plans. With respect to neighborhood design, the Urban Form and Neighborhood Design chapter encourages growth in regional centers, which have a sufficient base of both commercial and residential development to support transit services.

The Open Space and Conservation chapter of the Framework Element encourages an integrated citywide/regional public and private open space system that serves and is accessible to the City's population. The policies of this chapter recognize that there are communities where open space and recreation resources are currently in short supply and, therefore, suggest that vacated railroad lines, drainage channels, planned transit routes and utility rights-of-way, or pedestrian-oriented streets and small parks, where feasible, might serve as important resources for serving the open space and recreation needs of residents.

The Transportation chapter of the Framework Element includes proposals for major improvements to enhance the movement of goods, provide greater access to major intermodal facilities, and encourage a multimodal transportation system. It acknowledges that the quality of life for every citizen is affected by the ability to access work opportunities and essential services, affecting the City's economy, as well as the living environment of its citizens.[12] The Transportation chapter stresses that transportation investment and policies will need to follow a strategic plan, including capitalizing on currently committed infrastructure and the adoption of land use policies to better utilize committed

[11] City of Los Angeles Department of City Planning, *General Plan Framework Element*, July 27, 1995, pp. 4-1–4-2.

[12] City of Los Angeles Department of City Planning, *General Plan Framework Element*, July 27, 1995, p. 8-2.

infrastructure. This chapter of the Framework Element is implemented through Mobility Plan 2035, which was adopted by the City Council on September 7, 2016, and is a comprehensive update of the Transportation Element.

The Infrastructure and Public Services chapter of the Framework Element includes goals, objectives and policies to address public infrastructure and services necessary to support population growth and maintain and improve quality of life.

(b) Other Elements of the General Plan

As described previously, the General Plan includes other elements that integrate the seven state-mandated elements, as well as an Air Quality Element, Health and Wellness Element (Plan for a Healthy Los Angeles), and Service Systems Element/Public Recreation Plan.

The Health and Wellness Element (Plan for a Healthy Los Angeles) includes a high-level policy vision, along with measurable objectives and implementation programs to elevate health as a priority for the City's future growth and development.

The Air Quality Element sets forth the goals, objectives and policies to guide the City in the implementation of its air quality improvement programs and strategies. Applicable policies of the Air Quality Element are described in Section IV.B, *Air Quality,* of this Draft EIR.

The Conservation Element has the purpose of identifying, preserving, protecting, and managing the City's broad range of natural resources. Conservation Element policies address agricultural lands; animal keeping, nurseries and crop gardens; archaeological and paleontological resources, conservation (no policies), cultural and historical resources; endangered specifies, equine areas; erosion; fisheries; forest resources; geologic hazard (no policies) natural habitats; hazardous materials; landform and scenic vistas, ocean protection; open space and parks; and fossil fuels.

The City's 2010 Bicycle Plan (Bicycle Plan), adopted March 1, 2011, has been incorporated into Mobility Plan 2035.[13] Mobility Plan 2035, which was adopted by the City Council on January 20, 2016, and amended by the City Council on September 7, 2016, is a comprehensive update of the General Plan Transportation Element. Mobility Plan 2035 provides the policy foundation for achieving a transportation system that balances the needs of all road users, incorporates "complete streets" principles and lays the policy foundation for how future generations of Angelenos interact with their street. The purpose of Mobility Plan 2035 is to present a guide to the further development of a citywide transportation system for the efficient movement of people and goods. The Mobility Plan recognizes that primary emphasis must be placed on maximizing the efficiency of existing and proposed transportation infrastructure through advanced transportation technology,

[13] City of Los Angeles Department of City Planning, *Mobility Plan 2035: An Element of the General Plan*, adopted by City Council, September 7, 2016. Although adopted by City Council, the Mobility Plan is currently under litigation.

through reduction of vehicle trips, and through focusing growth in proximity to public transit. In addition, the Plan sets forth street designations and related standards.[14]

(c) Hollywood Community Plan

The land use policies and standards of the Framework Element and the General Plan elements are implemented at the local level through the community planning process. Community plans are oriented toward specific geographic areas of the City, defining locally the Framework Element's more general policies and programs and are intended to promote an arrangement of land uses, streets, and services that will encourage and contribute to the economic, social, and physical health, safety, welfare, and convenience of the people who live and work in the community. Goals, objectives, policies, and programs are created to meet the existing and future needs of the community. The Project Site is located within the Hollywood Community Plan area.

As shown on **Figure IV.H-1**, *General Plan Land Use Designations,* the Hollywood Community Plan designates the Project Site as Regional Center Commercial.

According to the Hollywood Community Plan, corresponding zones for the Regional Center Commercial designation include C2 and C4 (general commercial-retail, including residential), P and PB (parking), and RAS3 and RAS4 (residential accessory, including limited ground floor commercial). As noted in footnote 9 of the Hollywood Community Plan General Plan Land Use Map:

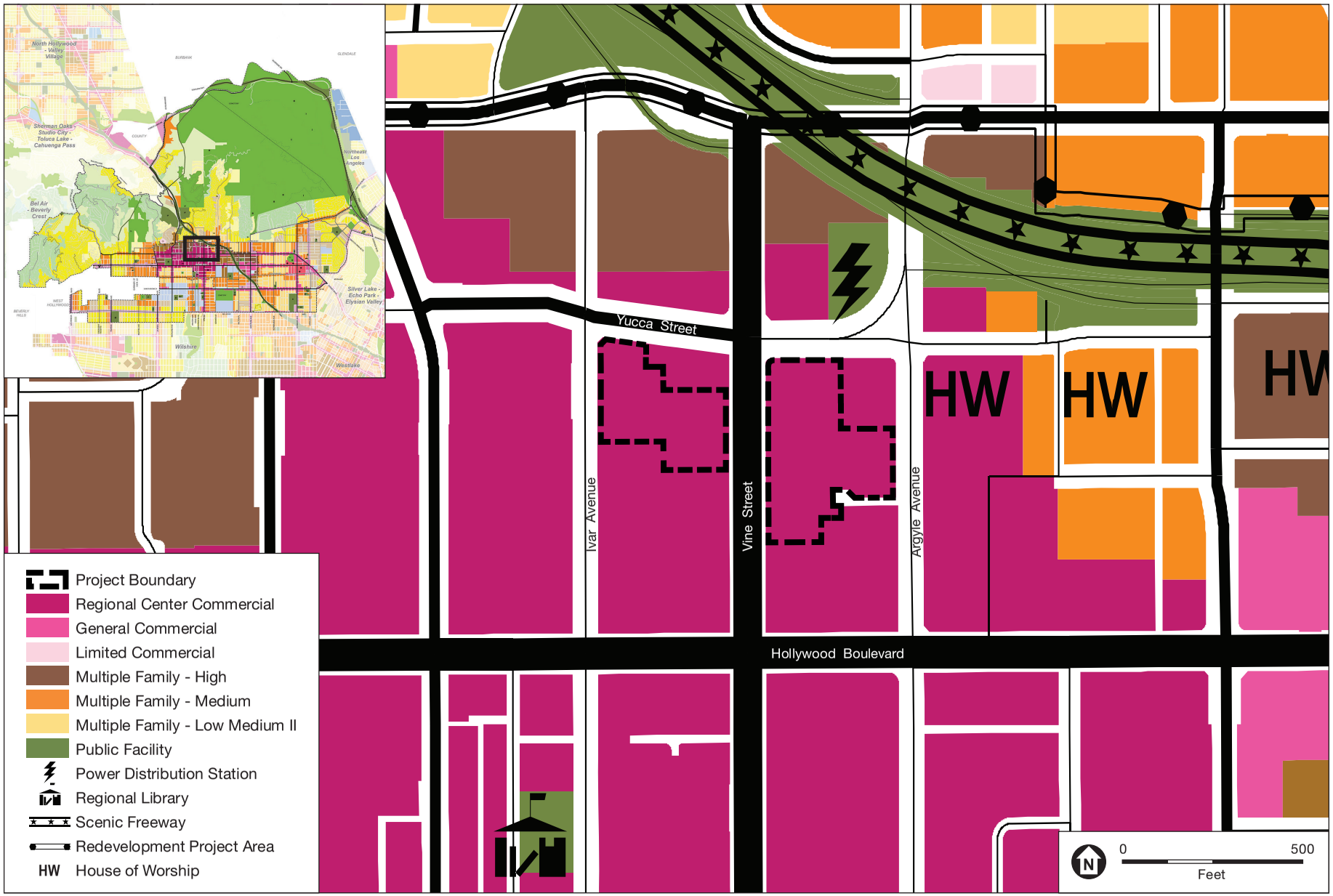
> *This designation is limited to the Hollywood Redevelopment Project Area. Development intensity is limited to 4.5:1 FAR with a maximum of 6:1 FAR possible through a Transfer of Development Rights procedure and/or City Planning Commission approval.*

Additional FAR restrictions apply to the project pursuant to policies of the Hollywood Redevelopment Plan and applicable zoning regulations as further described in subsequent sections. The Regional Center Commercial designation is reflected in other sites west, east, and south of the Project Site along Ivar Avenue, Vine Street, and Hollywood Boulevard.

(d) City of Los Angeles Municipal Code

Los Angeles Municipal Code (LAMC), Chapter 1 (Planning and Zoning Code) identifies a range of zoning classifications throughout the City, identifies the specific permitted uses applicable to each zone designation, and applies development regulations to each zone. **Figure IV.H-2**, *Zoning,* shows the generalized zoning for the Project Site and vicinity, as well as the specific zoning designation of the Project Site. The existing zoning designations and development standards applicable to the Project Site are discussed below.

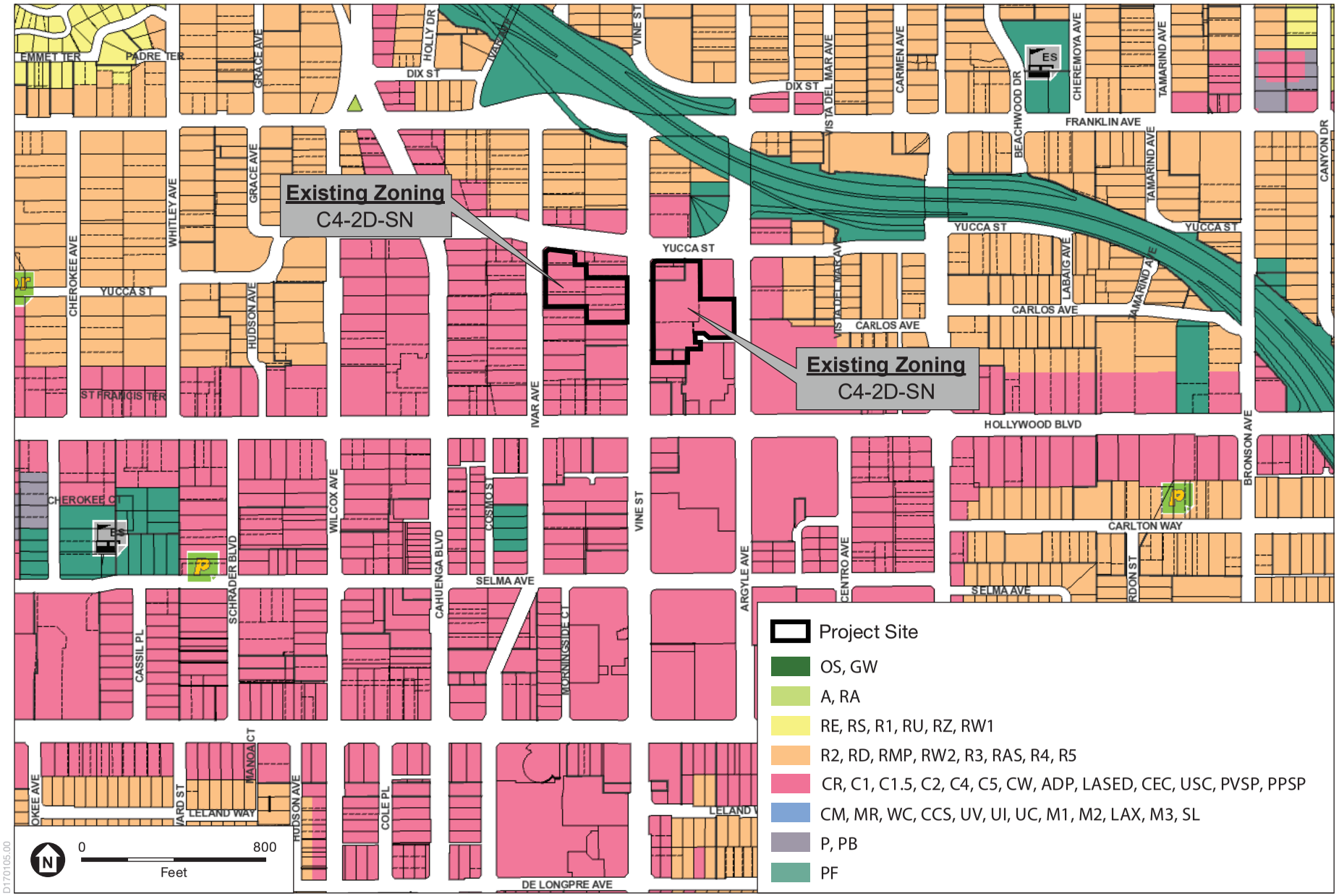
[14] City of Los Angeles Department of City Planning, *Mobility Plan 2035: An Element of the General Plan*, adopted by City Council, September 7, 2016, p. 17.



SOURCE: Los Angeles Department of City Planning – Systems, GIS and Graphics Division, April 2014

Hollywood Center Project

Figure IV.H-1
General Plan Land Use Designations



SOURCE: ZIMAS, 2018

Hollywood Center Project

Figure IV.H-2
Zoning

(i) Zoning Designation

As shown in Figure IV.H-2, the entire Project Site is zoned C4-2D-SN, which allows for multi-family residential development and commercial uses.

Current zoning maps indicate that the (T)(Q)C2-2-SN zoning designation also applies to the Project Site. The Applicant submitted an entitlement application to the City for a different project at the same Project Site in 2008. On or about July 24, 2013, the Los Angeles City Council approved and adopted Ordinance No. 182,636 (Case No. CPC-2008-3440-ZC-CUB-CU-ZV-DA-HD, VTT-71837) and certified an EIR (ENV-2011-675-EIR and State Clearinghouse [SCH] No. 2011041049) for entitlements related to that project. On or about April 30, 2015, the Los Angeles Superior Court issued a ruling invalidating the City Council's adoption and approval of Ordinance No. 182,636 and ENV-2011-675-EIR. On or about July 31, 2019, the Second District Court of Appeal affirmed the trial court's ruling. Therefore, the ordinance that amended the Project Site zoning from C4-2D-SN to (T)(Q)C2-2-SN and the accompanying EIR were invalidated by the 2015 and 2019 Court decision and the (T)(Q)C2-2-SN designation does not currently apply to the Project Site.

The C4 in the zoning designation indicates commercial uses, which when designated in a Regional Center is inclusive of multi-family residential uses consistent with the R4 Zone, pursuant to LAMC Section 12.22 A.18. The "2" indicates Height District 2, which allows unlimited building height with a maximum FAR of 6:1. However, the "D" indicates a Development Limitation, which restricts all the lots on the Project Site to a 3:1 FAR, with the exception of one lot (occupying the northwestern corner of the East Site, which comprises a portion of the Gogerty Building) to a 2:1 FAR.[15] The Project proposes to remove this "D" Limitation through a proposed Zone Change and Height District Change for the Project Site.

The SN designation indicates that the location of the Project Site is within an adopted Signage Supplemental Use District. In accordance with LAMC Section 13.11, sign districts may only be established in C or M Zones and certain R5 Zones, and include specific sign regulations to enhance the character of a SN district by addressing the location, number, square footage, height, light illumination and hours of illumination of signs permitted. The Project Site is within the boundaries of the Hollywood Signage Supplemental Use District,[16] which promotes the continuing contribution of signage to the distinctive aesthetic of Hollywood Boulevard, as well as controlling the impacts created by poorly placed, badly designed signs throughout Hollywood.

[15] The Development Limitation is pursuant to Ordinance No. 165,659. Ordinance No. 165,659 restricts the lots with Assessor's Parcel Numbers (APN) 5546-004-006, 5546-004-020, 5546-004-021, 5546-004-029, 5546-030-028, 5546-030-031, 5546-030-033, and 5546-030-034 to a 3:1 FAR, whereas the lot with APN 5546-030-032 has a 2:1 FAR.

[16] The Hollywood Signage Supplemental Use District is pursuant to Ordinance No. 176,172 as amended by Ordinance No. 181,340.

(e) City of Los Angeles Advisory Notice for Freeway-Adjacent Projects

The City of Los Angeles City Planning Commission (CPC) issued an advisory notice, Zoning Information File No. 2427 (ZI No. 2427) Freeway Adjacent Advisory Notice for Freeway-Adjacent Projects, effective September 17, 2018, regarding siting sensitive land uses in proximity to freeways. ZI No. 2427 notes a strong link between chronic exposure of populations to vehicle exhaust from roads and freeways and elevated risk of adverse health impacts, and identifies project features and design considerations that should be taken into account with development occurring within 1,000 feet of a freeway. ZI No. 2427 is informational in nature and does not impose any additional land use or zoning regulations, it is intended to inform project applicants of the importance of this issue. Although the City does not require a health risk assessment (HRA) for purposes of California Environmental Quality Act (CEQA) compliance, in light of the concerns with development in proximity to freeways, and to inform decision making associated with the Project's site planning and design, a quantitative HRA was prepared for the Project to disclose potential impacts associated with the siting of the Project near the Hollywood Freeway (US-101), which, at its closest point, is located approximately 380 feet north of the East Site's northernmost boundary.

The Freeway Adjacent Advisory Notice also notes Articles 5 and 9 of Chapter IX of the LAMC addressing sources of outside air in buildings, which requires all new mechanically ventilated buildings located within 1,000 feet of the freeway to install air filtration media that provides a Minimum Efficiency Reporting Value (MERV) of 13.

(f) Community Redevelopment Agency Hollywood Redevelopment Plan

The Hollywood Redevelopment Plan was first adopted in 1986 and was last amended in May 2003.[17] The Hollywood Redevelopment Plan will terminate on May 7, 2027.[18] The Hollywood Redevelopment Plan was initiated pursuant to State laws and carried out under the authority of the Community Redevelopment Agency (CRA). The CRA operated pursuant to community redevelopment legislation that provided tax increment financing and other tools to improve communities that met certain criteria of degradation and that could benefit from redevelopment activity. In 2011, the State approved ABx1-26,[19] which dissolved approximately 400 redevelopment agencies in California. While ABx1-26 dissolved redevelopment agencies, it did not dissolve the redevelopment plans. Accordingly, the existing Redevelopment Project Areas and the City's Redevelopment Plan remain in effect. Pursuant to the provisions of AB1x-26, CRA/LA was formed as the Designated Local Authority (DLA), and as a result, the Governor appointed its three-

17 City of Los Angeles, *Hollywood Redevelopment Plan*, adopted May 7, 1986, amended May 20, 2003.

18 CRA/LA, A Designated Local Authority, Project Areas, Hollywood Project Area Overview, http://www.crala.org/internet-site/Projects/Hollywood/index.cfm, accessed May 19, 2018.

19 State of California, Assembly Bill No. 26, approved June 2011, http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201120121AB26, accessed August 21, 2018.

member board. CRA/LA was then tasked with implementing and enforcing the requirements of the Hollywood Redevelopment Plan.

The land use authorities granted in the Redevelopment Plans remained effective with administration by the DLA beginning on February 1, 2012. In June 2012, the State passed additional legislation related to redevelopment (AB 1484), which allows a city to request that all land use related plans and functions of the former redevelopment agency be transferred to the jurisdiction that authorized the creation of the redevelopment agency. Pursuant to that legislation, in August 2014, the Planning and Land Use Management (PLUM) Committee of the Los Angeles City Council directed the City Attorney to prepare an ordinance that would transfer existing administrative and discretionary land use review of development projects in Redevelopment Plan areas to the Department of City Planning for continued implementation of the redevelopment programs and to seamlessly permit development to take place in those areas.[20] As further clarified by the CRA/LA, Community Plan land use and zoning designations prevail over the Redevelopment Plan map designations and future permit applications do not require discretionary land use approvals from CRA/LA. However, projects would continue to be reviewed by the City Planning Department for conformance with the Hollywood Redevelopment Plan.[21] On September 30, 2019, under authority granted in the Redevelopment Dissolution statutes, the Los Angeles City Council and Mayor approved a resolution and accompanying Ordinance No. 186,325 to transfer from the CRA/LA to the City of Los Angeles all responsibility for land use related plans and functions in the 19 remaining Redevelopment Project Areas.

The Hollywood Redevelopment Plan contains goals that encourage economic development; promote retaining the entertainment industry; revitalize the historic core; preserve and expand housing for all income groups; meet social needs of area residents; provide urban design guidelines; and preserve historically significant structures. The Hollywood Redevelopment Plan also provides a number of development guidelines and procedural operations to attain the plan goals. Among other guidelines, the Hollywood Redevelopment Plan identifies those land uses that are permitted on the Project Site and provides density standards for future development. The Hollywood Redevelopment Plan designates the Project Site as Regional Center Commercial, which is intended to provide for high quality commercial, recreational and a residential urban environment with an emphasis on entertainment oriented uses. The Regional Center Commercial designation is consistent with the land use intent of the Hollywood Community Plan Regional Center Commercial designation and the allowed density, which generally limits proposed development to an FAR of 4.5:1 but with allowed densities of 6:1 FAR pursuant to consistency with objectives of the Hollywood Redevelopment Plan. The Project Site is also located within the Hollywood Boulevard District, which is a special district of the Regional Center Commercial designation that establishes land use objectives for historic

[20] Case No.: CPC-2013-3169-CA. CEQA No.: ENV-2013-3170-CE. Council File No. 13-1482-S1.

[21] CRA/LA, A Designated Local Authority, Memorandum to Governing Board – Clarification Regarding Discretionary Land Use Actions, June 21, 2012.

and architectural preservation, appropriately scaled development and recommendations for an urban design plan containing design guidelines.

b) Existing Conditions

(1) Project Site

The 4.46-acre Project Site is located on the south side of West Yucca Street generally between North Ivar Avenue and North Argyle Avenue (composed of 10 parcels with the corresponding addresses of 1720-1724, 1740-1768, 1745-1753, and 1770 North Vine Street; 1746-1764 North Ivar Avenue; 1733-1741 North Argyle Avenue; 6236, 6270, and 6334 West Yucca Street) in the Hollywood Community Plan area of the City of Los Angeles. As shown on Figure II-2, *Aerial Photograph of Project Site and Vicinity*, in Chapter II, *Project Description*, of this Draft EIR, the Project Site is generally bounded by Yucca Street to the north, Argyle Street to the east, adjacent entertainment, residential, and commercial development to the south, and Ivar Avenue to the west. Vine Street bisects the Project Site, creating two distinct parts of the Project Site. The portion of the Project Site located between Ivar Avenue and Vine Street is identified as the "West Site" and the portion of the Project Site located between Vine Street and Argyle Avenue is identified as the "East Site."[22]

(a) West Site

The northern part of the West Site contains an approximately 1,237-square-foot single-story building, built in 1978, that is currently used by American Musical and Dramatic Academy (AMDA) for storage of sets and props. The remaining part of the West Site (approximately 78,512 square feet) contains a surface parking lot with a parking attendant kiosk. Existing access to the West Site is provided from a driveway off Vine Street and two driveways along Ivar Avenue. The entire West Site is enclosed by iron fencing and secured by a lockable gate.

(b) East Site

The East Site contains the Capitol Records Complex, which includes the 13-story Capitol Records Building (92,664 square feet of floor area), which contains ancillary studio recording uses, and the 2-story Gogerty Building (21,639 square feet), totaling approximately 114,303 square feet of existing floor area. The recording studio, office uses, and meeting rooms contained in the Gogerty and Capitol Records Buildings would remain after Project implementation. The Capitol Records Building, which reaches an above-grade height of approximately 165 feet, was built in 1956 and is the visual focal point of the Project Site. The adjacent Gogerty Building, constructed in 1930, was renovated in 2001 and reaches a height of approximately 33 feet above grade. As further described in Section IV.C, *Cultural Resources*, of this Draft EIR, both buildings within the

[22] The West Site includes Assessor Parcel Numbers (APNs) 5546-004-006, 5546-004-029, 5546-004-020, 5546-004-021, and 5546-004-032. The East Site includes APNs 5546-030-028, 5546-030-031, 5546-030-032, 5546-030-033, and 5546-030-034.

Capitol Records Complex are considered historical resources. The remaining part of the East Site (approximately 38,931 square feet) contains surface parking lots with controlled gated access.

(2) Surrounding Uses

As shown on Figure II-2, the Project Site and vicinity are urbanized and generally built out. The local vicinity is part of the Regional Center of Hollywood with a mix of commercial, hotel, studio/production, office, entertainment, and residential uses.

Adjacent development to the north of the Project Site, starting from the northwest corner of the West Site, is a 2-story residential building. Immediately north of the West Site bordering Yucca Street is a 5-story, mixed-use building currently occupied by AMDA and an associated surface parking lot. On the north side of Yucca Street is the 8-story Marsha Toy building that is also occupied by AMDA. On the northwest corner of Yucca Street and Argyle Avenue is the Los Angeles Department of Water and Power (LADWP) Distribution Station No. 52. Immediately north of the East Site and south of Yucca Street is a recently constructed 18-story, 114-unit mixed-use residential building at 6226 Yucca Street. At the northeast corner of Yucca Street and Argyle Avenue is the 15-story, 216-room Kimpton Everly Hotel at 1800 Argyle Boulevard.

To the east of the Project Site, there are three 2-story multi-family homes, a single-family home and a duplex. A 20-story, mixed-use development, known as the 6220 West Yucca Project, is currently proposed for this property, with a mix of residential, hotel, and commercial/restaurant uses. Further south, a 7-story, 507-unit Eastown mixed-use residential building has been developed at 6201 Hollywood Boulevard.

To the south of the East Site are a 1-story restaurant, surface parking, and the 3-story Hollywood Pantages Theatre. Farther to the south at the northeast corner of Hollywood Boulevard and Vine Street is the 12-story Equitable Building, which includes residential uses and has a ground floor restaurant/bar.

The structures directly west of the Project Site on the west side of Ivar Avenue include the 3-story Hotel Hollywood and various retail, restaurant, and service uses. South of the West Site on the west side of Vine Street is the Avalon Theater Building, and south of the theater on Vine Street is the 5-story h-Club LA. Also south of the West Site and northeast of Ivar Avenue and Hollywood Boulevard is an 11-story senior residential building (commonly referred to as the former Knickerbocker Hotel Building), and south of that is the 14-story L. Ron Hubbard Church of Scientology building.

In general, the land uses within the vicinity of the Project Site are characterized by a mix of low- to high-intensity residential, commercial, mixed-use and industrial buildings, which vary in building style and period of construction.

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a project would have a significant impact related to land use and planning if it would:

Threshold (a): Physically divide an established community; or

Threshold (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.

For this analysis, the Appendix G thresholds listed above are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G threshold questions. The factors used to evaluate land use impacts are listed below.

(1) Land Use Consistency

- Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site; and
- Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.

(2) Land Use Compatibility

- The extent of the area that would be impacted, the nature and degree of impacts, and the type of land uses within that area;
- The extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and
- The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the proposed project.

b) Methodology

The analysis of potential land use impacts considers consistency of the Project with adopted plans, regulations, and development guidelines, and in some instances advisory guidance, that are applicable to the Project Site and the Project and that have been adopted for the purpose of avoiding or mitigating an environmental effect.

CEQA Guidelines Section 15125(d) requires that in describing the environmental setting, an EIR include a discussion of any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans. Separately, Appendix G recommends that a lead agency consider whether the project would cause a significant environmental impact due to a conflict with land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Importantly, a conflict between a project and an applicable plan is not necessarily a significant impact under CEQA unless the inconsistency will result in an adverse physical change to the environment that is a "significant environmental effect" as defined by CEQA Guidelines Section 15382. As provided in CEQA Guidelines Section 15126.2 "an EIR shall identify and focus on the significant effects of the proposed project on the environment." An excerpt from the legal practice guide, Continuing Education of the Bar, Practice Under the California Environmental Quality Act, Section 12.34 illustrates the point:

> *"An inconsistency between a proposed project an applicable plan is a legal determination not a physical impact on the environment. …if a project affects a river corridor, one standard for determining whether the impact is significant might be whether the project violates plan policies protecting the corridor; the environmental impact, however, is the physical impact on the river corridor."*

Under State Planning and Zoning law (Government Code Section 65000 et seq.) strict conformity with all aspects of a plan is not required. Generally, plans reflect a range of competing interests and agencies are given great deference to determine consistency with their own plans. A proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one or more policies and does not obstruct other policies. Generally, given that land use plans reflect a range of competing interests, a project should be compatible with a plan's overall goals and objectives but need not be in perfect conformity with every plan policy.

Project consistency with applicable policies that have been adopted for the purpose of avoiding or mitigating an environmental effect as set forth in SCAG's 2016–2040 RTP/SCS, the Framework Element, Hollywood Community Plan, and Hollywood Redevelopment Plan are provided in tables contained in Appendix J*, Land Use Plans and Policies: Project Consistency Tables*, of this Draft EIR. The results and determination of whether the Project would cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect is provided in the impact analysis below. To the extent that the Projects' potential conflict with a plan, program or policy is analyzed in another section of the EIR that plan is not further discussed in the Land Use Section. For example, consistency with transportation plans is analyzed in Section IV.L, *Transportation*.

As previously indicated, although the City does not require a health risk assessment, in response to the City's ZI No. 2427, as well as recommendations from the California Air Resources Board (CARB),[23] an HRA was prepared to assess the proposed siting of new residential land uses in proximity to the US-101 Freeway, a substantial existing source of Toxic Air Contaminants (TACs). The HRA analyzes potential health impacts of siting

[23] California Environmental Protection Agency, California Air Resources Board, *Air Quality and Land Use Handbook*, April 2005. CARB's siting recommendation for freeways is to avoid siting sensitive receptors within 500 feet of a freeway. The CARB recommendations in the Handbook are voluntary and do not constitute requirements or mandates for either land use agencies or local air districts.

future sensitive receptors (in particular future residents of the Project including senior residents) in proximity (less than 1,000 feet) of US-101 on the Project Site.

TACs are a broad class of compounds known to cause or contribute to cancer or non-cancer health effects such as birth defects, genetic damage, and other adverse health effects. TACs from freeways are generated through combustion of fuel (primarily diesel). TACs are typically found in low concentrations, even near their source (e.g., benzene near a freeway). However, the effects from TACs may be both chronic and acute on human health. Cancer is the effect of major concern for this type of exposure, and could require a period of 30 years or more after exposure to develop. The US-101 is approximately 380 feet north of the East Site's northernmost boundary.[24] As shown in **Figure IV.H-3,** *Project Location within Freeway Health Risk Assessment Study Area*, the closest sensitive receptors to the US-101 would include the East Senior Building approximately 560 feet from the US-101 and the East Building approximately 640 feet from the US-101. The West Senior Building would be approximately 660 feet from the US-101 and the West Building would be approximately 710 feet from the US-101. The HRA, included in Appendix E of this Draft EIR, evaluates the potential cancer risks and acute and chronic non-cancer health impacts to sensitive receptors at the residential uses on the Project Site from TAC emissions associated with vehicular traffic on the US-101 and explains the methodology for the analysis.

c) Project Design Features

There are no Project Design Features that relate to land use.

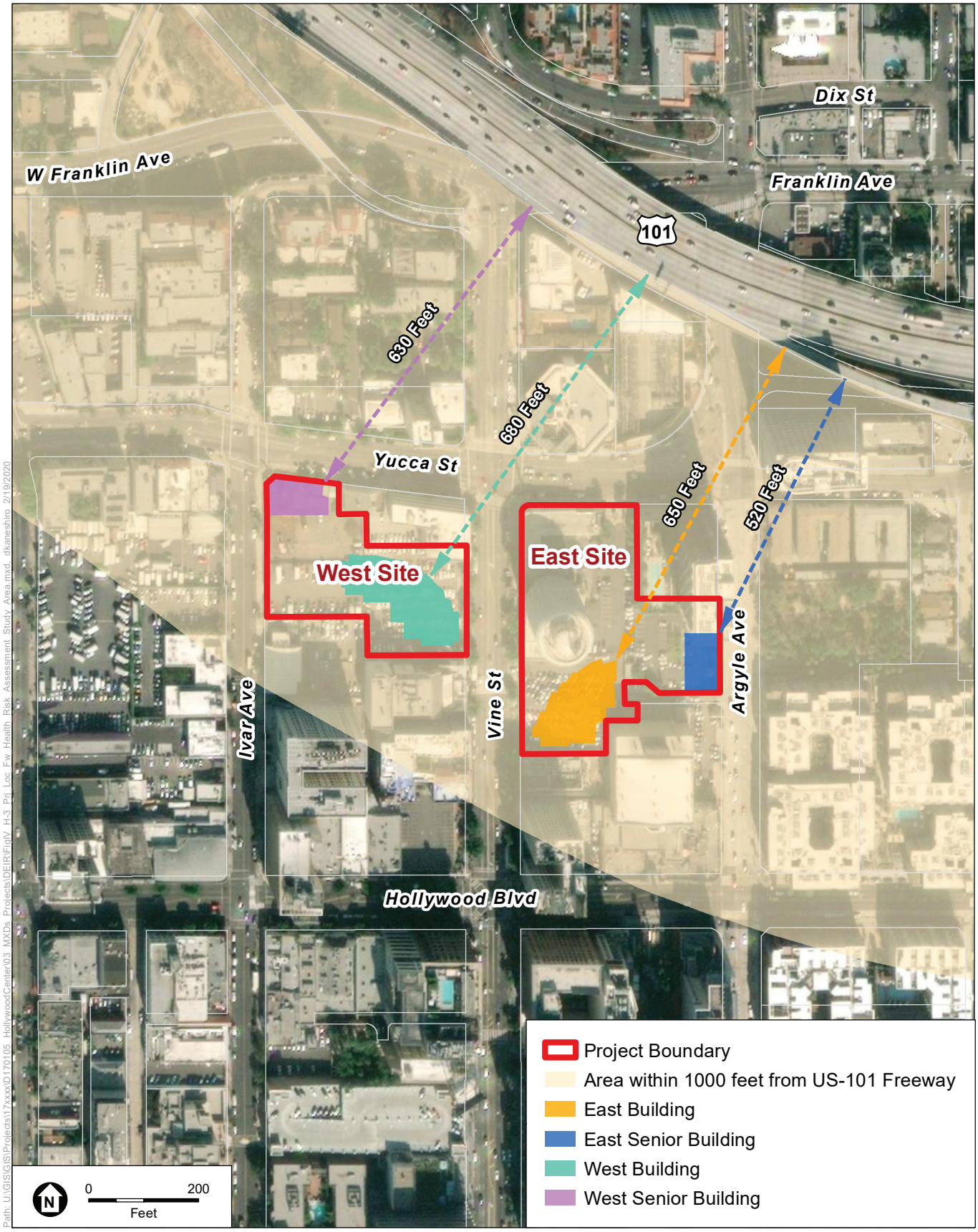
d) Analysis of Project Impacts

Threshold (a): Would the Project physically divide an established community?

As discussed in Section VI.6, *Impacts Found Not to Be Significant,* of this Draft EIR and in the Initial Study (Appendix A) of this Draft EIR, the Project and the Project with the East Site Hotel Option would not physically divide an established community and a less than significant impact would occur with respect to Threshold (a). **No further analysis is required.**

Threshold (b): Would the Project cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

[24] While the Project Site's northernmost boundary on the East Site is approximately 380 feet from the US-101, the new buildings that would be constructed on the Project Site would be located more than 500 feet away from the US-101.



SOURCE: Digital Globe, 2018; ESA, 2018.
Note: Distances are approximate.

Hollywood Center Project

Figure IV.H-3
Project Location Within
Freeway Health Risk Assessment Study Area

The Project with the East Site Hotel Option would replace some residential units with hotel units, and the number of affordable residential units within the East Senior Building would be reduced compared to the Project. However, despite these changes in the development program, the Project's consistency with applicable plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect would be essentially the same for the Project and for the Project with the East Site Hotel Option. Thus, the conclusions regarding the impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option. Where applicable and relevant, differences between the Project and Project with the East Site Hotel Option are noted.

(1) Impact Analysis

The development of the Project would be subject to various land use plans, policies, and the development regulations in the LAMC's Planning and Zoning Code. The Project's consistency with the applicable City and regional regulations, plans, and policies are addressed below and include SCAG's 2016–2040 RTP/SCS, the City's Framework Element, Hollywood Community Plan, Hollywood Redevelopment Plan, and LAMC.

Other plans that address the distribution of land use in the region and that are linked with the SCAG Plans are addressed in other sections of this Draft EIR. Specifically, Project consistency with the AQMP is analyzed in Section IV.B, *Air Quality,* and Senate Bill (SB) 375 and SCAG's Sustainable Communities Strategy are discussed in Section IV.E, *Greenhouse Gas Emissions*, of this Draft EIR.

(a) SCAG's 2016–2040 RTP/SCS

SCAG's 2016–2040 RTP/SCS incorporates several goals that are applicable to the Project and that would avoid or reduce the Project's environmental impacts. As shown in **Table LU-1**, *Consistency of the Project with Applicable Goals of the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy*, provided in Appendix J of this Draft EIR, the Project would not conflict with applicable goals of the RTP/SCS. As further described in Table LU-1, in Appendix J, the goals of the RTP/SCS are focused on such priorities as promoting land use and growth patterns that facilitate transit use and active transportation (e.g., bicycling and walking), reducing vehicle miles traveled, and encouraging energy efficiency The Project would meet RTP/SCS goals through such features and characteristics as: siting a high density mixed-use development within a Transit Priority Area (TPA) and within 600 feet from the Metro Red Line Hollywood/Vine Station; providing bicycle parking spaces, bike lockers, and showers in accordance with the LAMC; facilitating active transportation with a broad landscaped paseo, elimination of curb cuts and activation of Vine Street for pedestrians and cyclists with a stronger connection to the Hollywood Walk of Fame and Capitol Records Building; compliance with LEED Gold certification or equivalent standards; provisions for on-site electric vehicle (EV) charging stations; incorporating green building features, such as heat reduction strategies, on-site recycling, use of materials meeting sustainability standards, and use of high efficiency fixtures, appliances, and heating, ventilation and air conditioning

systems. Accordingly, and as further described in Appendix J of this Draft EIR, the Project and the Project with the East Site Hotel Option would be consistent with and not conflict with applicable goals of SCAG's 2016–2040 RTP/SCS, which were adopted for the purpose of avoiding or mitigating an environmental effect, impacts with respect to consistency with the RTP/SCS would be less than significant.

(b) City of Los Angeles General Plan Framework Element

The Framework Element establishes the conceptual basis for the City's General Plan. The Framework Element sets forth a Citywide comprehensive long-range growth strategy and establishes Citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. Framework Element land use policies do not override or supersede the more detailed community plans and specific plans.

Table LU-2, *Comparison of the Project to Applicable Objectives and Policies of the Framework Element*, provided in Appendix J of this Draft EIR, evaluates the consistency of the Project with objectives and policies of the Framework Element. As discussed in Table LU-2, the Project would not conflict with applicable objectives and policies of the Framework Element. The following summarizes the results of Table LU-2.

The Project would provide 872 market-rate, multi-family residential units and 133 senior affordable dwelling units, or 768 market-rate, multi-family units and 116 senior affordable dwelling units under the Project with the East Site Hotel Option, within approximately 600 feet of the Metro Red Line Hollywood/Vine Station, thus intensifying development, addressing housing needs, and facilitating a reduction in per capita vehicle miles traveled and air pollution. The Project's location within a TPA would further draw new residential population, visitors, and employees with access to restaurant, retail, recreation, and entertainment activities within walking and biking distances with convenient access to multiple Metro bus routes and the Metro Red Line Hollywood/Vine Station.

The Project and the Project with the East Site Hotel Option would both provide 30,176 square feet of neighborhood-serving commercial and restaurant space and 33,922 square feet of publicly accessible open space. The open space areas and ground floor restaurant uses would activate the street frontages along Vine Street and Argyle Avenue, allowing visitors to visit the restaurants, outdoor dining areas, and the public open space plazas and their amenities, including a two-block paseo between Argyle Avenue and Ivar Avenue. Accordingly, and as further described in Appendix J of this Draft EIR, the Project and the Project with the East Site Hotel Option would not conflict with applicable objectives and policies of the Framework Element, which were adopted for the purpose of avoiding or mitigating an environmental effect, impacts with respect to the Framework Element would be less than significant.

(c) Hollywood Community Plan

Table LU-3, *Consistency of the Project with Applicable Objectives of the Hollywood Community Plan*, provided in Appendix J of this Draft EIR, includes a detailed evaluation

of the consistency of the Project with objectives of the Hollywood Community Plan. The following summarizes the results of Table LU-3.

The Project would increase population density in proximity to the Metro Red Line Hollywood/Vine Station, other regional Metro bus lines, and the LADOT DASH lines by providing 872 market-rate, multi-family residential units and 133 senior affordable dwelling units, or 768 market-rate, multi-family units and 116 senior affordable dwelling units under the Project with East Site Hotel Option. In addition, the Project would provide new restaurant/retail and residential uses, which would activate the street frontage in a manner consistent with accepted planning principles and standards as the retail and restaurant uses would be provided at ground level in a pedestrian-friendly setting, with a paseo and plazas adjacent to the Hollywood Walk of Fame and the Capitol Records Building.

Accordingly, and as further described in Appendix J of this Draft EIR, the Project and the Project with the East Site Hotel Option would not conflict with applicable policies of the Hollywood Community Plan, which were adopted for the purpose of avoiding or mitigating an environmental effect, impacts with respect to Hollywood Community Plan would be less than significant.

(d) Hollywood Redevelopment Plan

The Hollywood Redevelopment Plan includes 13 Sections, many of which are not applicable to the Project, such as those pertaining to financing, economic development, certain social goals, etc. However, certain goals of the Hollywood Redevelopment Plan provide guidelines for development in the designated Hollywood Redevelopment area in which the Project is located. The most notable goals of the Hollywood Redevelopment Plan that pertain to the nature of future development are contained in Sections 300 and 500 of the Hollywood Redevelopment Plan and are discussed in detail in **Table LU-4**, *Consistency of the Project with Applicable Sections of the Hollywood Redevelopment Plan,* provided in Appendix J of this Draft EIR.

As presented in Table LU-4, the Project would be consistent with and not conflict with the applicable Hollywood Redevelopment Plan goals related to employment, land use and design, housing, sound residential neighborhoods, circulation, and open space/recreation.

The Project would preserve landmarks related to the entertainment industry and promote the Walk of Fame through a paseo leading between Argyle Avenue and Vine Street, a mid-block pedestrian crosswalk across Vine Street with enhanced landscaping, an outdoor performance space, outdoor seating, landscaping, ground level shops and restaurants along Vine Street and throughout the paseo. By repurposing parcels operating as surface parking, and creating a stronger connection to the Hollywood Walk of Fame and the Capitol Records Complex. The Project would both increase the supply and improve the quality of housing for all income and age groups, especially for persons with low and moderate incomes in that it would provide up to 1,005 new housing units, including up to 133 senior affordable housing units. The Project's design and building

setbacks would maximize view corridors and create a stronger connection to Vine Street and the Hollywood Walk of Fame.

The Project would encourage a circulation system which would improve the quality of life in Hollywood by increasing population density in proximity to the Metro Red Line Hollywood/Vine Station, services, retail uses, restaurants, and jobs, all within walking distance.

The Project would be consistent with the land uses encouraged for designated Regional Centers in the Framework Element and Hollywood Community Plan and complement the existing buildings in areas having architecturally and/or historically significant structures. The Project would provide a range of housing types and commercial uses that would support the needs of the City's existing and future residents; would expand the diversity within the designated Regional Center; and would provide housing in close proximity to commercial, retail, entertainment, and restaurant uses. Under the Project with the East Site Hotel Option, 220 hotel rooms would be provided to the area, thus supporting tourism and the economic viability of the entertainment, commercial, and tourist activities in the area. The provision of neighborhood-serving commercial uses provided alongside open space and entertainment uses at the ground level of the Project would support the Project's residents, as well as other off-site residents, tourists, and visitors by providing commercial, recreational, and entertainment services within an accessible, walkable, and active environment. The Project, which would promote walkability by providing a paseo, open space plazas, and activated street frontages, would not conflict with Redevelopment Plan policies to provide a balance in the community or to provide for substantial public open space in the Project area.

The proposed Project is requesting an increase from a base 6:1 FAR to a 7:1 FAR. The increase in FAR beyond 6:1 is allowed by the LAMC but would be subject to City findings that the Project would further the goals and intent of the Hollywood Redevelopment Plan by meeting such objectives as: concentrating high intensity and/or density development in areas with reasonable proximity or direct access to high capacity transportation facilities; providing new development which compliments existing buildings in areas with architecturally and/or historically significant structures; and, providing focal points for entertainment, tourism and pedestrian oriented uses. The Project would meet these objectives by providing a mixed-use, higher-density development within a Regional Center and near public transit, including the Metro Red Line Hollywood/Vine Station, with a design that complements the architecturally and historically significant Capitol Records Building. The Project would also provide a focal point for entertainment and tourism, through a design that includes restaurants, outdoor dining areas, plazas and a two-block paseo between Argyle Avenue and Ivar Avenue, with improved access to the adjacent Hollywood Walk of Fame and Capitol Records Building.

Through compliance with such objectives and appropriate findings, and as further supported by the analysis provided in Appendix J of this Draft EIR, impacts with respect to the applicable goals and policies of the Hollywood Redevelopment Plan, which were adopted for the

purpose of avoiding or mitigating an environmental effect, would be less than significant, and the Project and the Project with the East Site Hotel Option would be consistent with and not conflict with the goals set forth in the Hollywood Redevelopment Plan.

(e) City of Los Angeles Municipal Code

The Project Site is zoned C4-2D-SN. The C4 Zone permits similar commercial and multiple family residential uses as described above for the C2 Zone. The "2" indicates Height District 2 and SN indicates Sign District. The "D" indicates a Development Limitation, which limit some lots to a 3:1 FAR and other lots to a 2:1 FAR.[25] However, a project could exceed the FAR as long as the Department of City Planning finds that the Project is consistent with the Hollywood Redevelopment Plan, that the developer entered into an Owner Participation Agreement (OPA) with the CRA Board, and the Project is approved by the City Planning Commission, or City Council on appeal.

The Project proposes a mixed-use development including up to 1,005 multi-family residential dwelling units (including 133 senior affordable units), 30,176 square feet of restaurant/retail uses, and 166,582 square feet of open space. The resulting FAR would be 6.973:1. The two senior buildings would be up to 11 stories, the West Building would be 35 stories, and the East Building would be 46 stories. Under the Project with the East Site Hotel Option, the Project would develop 884 multi-family residential dwelling units (including 116 senior affordable units), 30,176 square feet of restaurant/retail uses, and 150,371 square feet of open space. The resulting FAR would be 6.901:1. The only change in massing would be that the East Senior Building would be reduced from 11 stories to 9 stories.

To allow for development of the Project, the zoning would be amended to C2-2-SN to eliminate the "D" Limitation, which limits FAR to 3:1 and 2:1 on certain parcels. The Project Site is not subject to height limits. The requested removal of the "D" Limitation would allow an increase in floor area, which is consistent with the Project Site's Regional Center designation. The Project also requests a Conditional Use Permit as a unified, mixed-use development pursuant to LAMC Section 12.24 W.19 to allow FAR averaging to permit the FAR to be calculated as a whole rather than by individual parcel or lot and for a residential density transfer between the West Site and East Site. In addition, pursuant to LAMC Section 11.5.11(e) and California Government Code Section 65915(k) or the Transit Oriented Communities Affordable Housing Incentive Program, three incentives, concessions, reductions, or modifications of zoning code requirements would be requested to offset affordable housing costs as follows: and include a 35 percent FAR bonus (from 6:1 FAR) to allow an FAR up to 7:1; and a development modification to allow the floor area of any residential balconies and terraces to be excluded for purposes of calculating the buildable floor area.

[25] The Development Limitation is pursuant to Ordinance No. 165,659. Ordinance No. 165,659 restricts the lots with Assessor's Parcel Numbers (APN) 5546-004-006, 5546-004-020, 5546-004-021, 5546-004-029, 5546-030-028, 5546-030-031, 5546-030-033, and 5546-030-034 to a 3:1 FAR whereas the lot with APN 5546-030-032 has a 2:1 FAR.

Setbacks are not required for commercial uses in the C2 Zone; however, residential uses require side and rear yard setbacks to conform to the requirements of the R4 Zone and applied to each floor that serves residential purposes. To conform to LAMC Section 12.14 C requirements, the senior residential buildings and the residential portions of the mixed-use buildings would be required to provide a side yard of at least 16 feet, a rear yard setback of 20 feet, and no front yard setback is required. Setbacks must be open and unobstructed to the sky. The Project's West Senior Building is located toward the front of the site at the corner of Ivar Avenue and Yucca Street and is located over 16 feet from the side property line. The West Building which contains residential uses on Level 2 through Level 35 is located over 16 feet from the side property line along Vine Street and over 20 feet from the rear property line. The East Senior Building is situated at the southeast corner of the Project Site. It is located 16 feet from the side property line along Argyle Avenue and over 20 feet from the rear property line. The East Building is located over 16 feet from the side yard property line along Vine Street and over 20 feet from the rear property line. Therefore, the Project would comply with the LAMC setback requirements for residential uses in the C2 Zone.

Based on the proposed number of housing units and the mix of unit types, the Project would be required to provide at least 120,175 square feet of useable open space. The Project provides 166,582 square feet of total open space including 33,922 square feet of outdoor publicly accessible open space; 53,102 square feet of resident-only, outdoor common open space and 39,598 square feet of resident-only, indoor common open space (a total of 89,060 square feet of resident-only common open space); and 43,600 square feet of private open space in the form of private balconies. The indoor common open space in the West and East buildings would include recreational spaces such as fitness rooms, community rooms, libraries, and screening rooms and an amenity deck that includes both indoor and outdoor spaces and a pool. Additional outdoor open space would include private balconies. The senior buildings would include rooftop terraces and indoor, multi-purpose recreational spaces. The Project would be consistent with and not conflict with the requirements for open space on the Project Site, pursuant to LAMC Section 12.21 G.

Under the Project with the East Site Hotel Option, fewer residential units are proposed, and therefore less open space is required (106,525 square feet). The Project with the East Site Hotel Option would provide 33,922 square feet of publicly accessible open space (same as under the Project), 78,049 square feet of resident-only common open space, and 38,400 square feet of private open space in the form of balconies. Thus, the total amount of usable open space under the Project with the East Site Hotel Option would exceed the LAMC open space requirement.

The Project would provide landscaping at a minimum of 25 percent of the common open space and would provide 130 trees on the West Site and 122 trees on the East site for a

total of 252 trees, including street trees.[26] At present, the Project Site contains 48 trees, all of which would be removed. With the additional trees proposed, there would be a net increase of 188 trees on the Project Site, including street trees. The Project would further comply with the City's Urban Forestry Division's requirements, which currently requires street tree replacement on a 2:1 basis and approval by the Board of Public Works. In addition, landscaped areas throughout the Project Site would include native plants, shrubs, perennials, and groundcover.

The Project proposes the sale of a full line of alcoholic beverages in association with the proposed 30,176 square feet of commercial/restaurant uses and for any alcohol uses associated with the hotel under the Project with the East Site Hotel Option. Pursuant to LAMC Section 12.24 W.1, a Conditional Use Permit for the sale or dispensing of alcoholic beverages for on-site and off-site consumption at 12 establishments would be required, and a Master Conditional Use Permit may be requested. Several restaurants/bars and entertainment uses with permits to serve alcohol are already located near the Project Site.

The Project would provide up to 1,005 residential units, and the Project with the East Site Hotel Option would provide up to 884 residential units and 220 hotel rooms. Pursuant to LAMC Section 16.05, Site Plan Review is required when a development results in an increase of 50 or more dwelling units and/or guest rooms or generates more than 1,000 average daily trips.

The Project includes the following Vesting Tentative Tract Map request: pursuant to LAMC Section 17.15, a Vesting Tentative Tract Map No. 82152 to allow the merger of 16 existing lots and the subsequent re-subdivision of a 4.613-acre site into 3 ground lots and 35 airspace lots for a total of 38 lots; the merger of an alley to add 1,313 square feet to the Project Site and portions along the sidewalk of Yucca Street and both sides of Vine Street to add 5,163 square feet to the Project Site; an associated haul route for the export of 542,300 cubic yards of soil; and the removal of 16 street trees.

With approval of the requested discretionary actions, the Project and the Project with the East Site Hotel Option would be consistent with and not conflict with the provisions of the LAMC governing land use and planning, and impacts with respect to provisions of the LAMC governing land use and planning would be less than significant.

(f) Health Risk Assessment for Freeway Adjacent Projects

The Project Site at its closest point is located approximately 380 feet south from the US-101, as shown in Figure IV.H-3. As previously indicated, although the City does not require a health risk assessment, in response to ZI No. 2427, to address heightened concern with development in proximity to freeways, and to inform decision making

[26] As defined in LAMC Section 12.21 G.2 (a)(3): At least one 24-inch box tree for every four dwelling units shall be provided on site and may include street trees in the parkway. For a surface area not located directly on finished grade that is used for common open space, and located at ground level or the first habitable room level, shrubs and/or trees shall be contained within permanent planters at least 30 inches in depth, and lawn or ground cover shall be at least 12 inches in depth. All required landscaped areas shall be equipped with an automatic irrigation system and be properly drained.

associated with Project's site planning and design, an HRA was prepared to assess the potential health impacts for on-site sensitive receptors that would be located within 1,000 feet of US-101, as discussed below.

The impact discussion below is based on a summary of the detailed US-101 HRA performed for the Project, with supporting calculations provided in Appendix E of this Draft EIR. The analysis evaluated impacts at the Project's multi-family residential uses at the West Building and East Building and at the West Senior Building and East Senior Building.

The Project's maximum impacted multi-family residential receptor would be located at the northeastern corner of the West Building, located approximately 710 feet from US-101. The maximum modeled cancer risk at this location would be approximately 9.02 in 1 million for the 30-year residential exposure scenario, which is below the 10 in 1 million significance threshold. The cancer risk for all other on-site multi-family residential receptors in the West Building and East Building would be less than 9.02 in 1 million. These maximum cancer risks do not account for the effect of indoor air filtration from the required installation of MERV 13 filters, which would lower indoor air concentrations of diesel particulate matter (DPM) and lower the cancer risks.

The Project's maximum impacted senior building receptor would be located at the northeastern corner of the East Senior Building, located approximately 560 feet from US-101. The maximum modeled cancer risk at this location would be approximately 9.83 in 1 million for the 30-year residential exposure scenario, which would be below the 10 in 1 million significance threshold. The cancer risk for all other on-site senior building residential receptors in the West Senior Building and East Senior Building would be less than 9.83 in 1 million. These maximum cancer risks do not account for the effect of indoor air filtration from the required installation of MERV 13 filters, which would lower indoor air concentrations of DPM and lower the cancer risks.

As previously discussed in Section IV.H.2, *Regulatory Framework,* under City of Los Angeles Advisory Notice for Freeway-Adjacent Projects, the City adopted pollutant control requirement in LAMC Section 99.04.504 and Section 99.05.504, which requires the installation of MERV 13 filters in residential and non-residential uses with mechanically ventilated buildings within 1,000 feet of a freeway. The ASHRAE 52.5 standard provides removal efficiencies for mechanical filtration. According to the ASHRAE 52.2 standard, MERV 13 filters have reduction efficiencies of 50, 85, and 90 percent for particles with diameter ranges of 0.3 to 1.0 µm, 1.0 to 3.0 µm, and 3.0 to 10.0 µm, respectively.[27] As a conservative assumption, this assessment assumes a 50-percent control efficiency even though the portion of DPM between 1.0 µm and 3.0 µm would be controlled at 85 percent and the portion of DPM between 3.0 µm and 10.0 µm would be controlled at 90 percent. With incorporation of MERV 13 indoor air filters, the maximum cancer risk from TAC emissions for the maximum impacted multi-family residential receptor would be reduced to approximately 5.64 in 1 million, which would be below the 10 in 1 million significance

[27] National Air Filtration Association, Understanding MERV, https://www.nafahq.org/understanding-merv-nafa-users-guide-to-ansi-ashrae-52-2/, updated October 2018, accessed March 24, 2020.

threshold. With incorporation of MERV 13 indoor air filters, the maximum impacted senior building residential receptor would be reduced to approximately 6.13 in 1 million, which would be below the 10 in 1 million significance threshold. As discussed previously, air filtration systems with filters have limitations for reducing indoor air pollution. For example, the use of MERV 13 filters would have reduced DPM filtration effectiveness when individual Project residents voluntarily decide to have their windows or doors open. MERV 13 filters would not reduce DPM concentrations in open space or other common space areas that do not have air filtration systems with filters installed. Also, MERV 13 filters do not remove gaseous pollutants.

As the Project's on-site sensitive receptors would not be exposed to cancer risks from freeway emissions from the US-101 in excess of the significance thresholds, the Project would provide an adequate health-based separation distance from the freeway, and cancer risk impacts would be less than significant impact.

The maximum modeled non-cancer Hazard Index for the Project Site associated with acute (one-hour), chronic (eight-hour), and chronic (annual) exposures would be substantially below the significant threshold of a Hazard Index of 1.0. The maximum non-cancer values do not account for the effect of indoor air filtration from the required installation of MERV 13 filters, which would lower indoor air concentrations of DPM and lower the non-cancer risks. As a result, the Project would provide an adequate health-based separation distance from the freeway and non-cancer impacts would be less than significant and no mitigation measures would be required.

(g) Conclusion

Based on the analysis of Project consistency with applicable policies of the Framework Element, Hollywood Community Plan, Hollywood Redevelopment Plan, LAMC, SCAG's 2016–2040 RTP/SCS, and ZI No. 2427, and related SCAQMD and CARB guidelines, the Project would be consistent with and not conflict with the relevant land use policies adopted for the purpose of avoiding or mitigating a significant environmental effect.

The Project would be consistent with and not conflict with policies related to siting of residential uses near substantial sources of air pollutants (the US-101) as stated in the Framework Element, Housing Element, Hollywood Community Plan, and the 2016–2040 RTP/SCS. Although residential uses are located near the US-101, on-site residents would not be exposed to significant levels of TACs based on applicable SCAQMD thresholds. Therefore, impacts with respect to these policies would be less than significant.

Approval of the Project's requested entitlements, including the Zone and Height District Change, Conditional Use Permits, Site Plan Review and related findings and conditions to ensure compatibility with surrounding land uses would bring the Project into consistency with the Framework Element, Hollywood Community Plan, Hollywood Redevelopment Plan, and LAMC. **Therefore, with the approval of the proposed entitlements, the Project and the Project with the East Site Hotel Option would be**

consistent with and not conflict with applicable land use plans, policies, and regulations, and impacts would be less than significant.

(2) Mitigation Measures

Impacts regarding land use and planning were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Impacts regarding land use and planning were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

As analyzed above, despite the differences in their respective development programs, the Project and Project with the East Site Hotel Option would be similarly consistent with and not conflict with applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. Thus, the conclusions regarding the cumulative impact analysis and impact significance presented below are the same and apply to the Project and Project with the East Site Hotel Option.

(1) Impact Analysis

Chapter III, *Environmental Setting*, of this Draft EIR, lists 123 related projects that are planned or are under construction within the City of Los Angeles and generally within the built out Hollywood Community Plan area. There are also 27 related projects within the adjacent City of West Hollywood. Most of the related projects are concentrated within the center of the Hollywood Community Plan area on properties designated as Regional Center Commercial in the Hollywood Community Plan and Regional Center, as identified in the Framework Element. These designations are intended for high-density development that serves as a focal point of regional commerce, identity, and activity. The designations accommodate a wide range and mix of uses, including multi-family housing, office space, retail, hotel, restaurant services, and entertainment activities at densities that support the development of a comprehensive and inter-connected network of public transit and services. Regional Centers are characterized by their major transit hubs, and the land use designations support high-density development and the integration of housing with commercial uses in these locations.

The Project Site is located within a TPA as designated by the City in response to SB 743. The Project would contribute to the concentration of mixed-use infill development within a TPA and within convenient access to the Metro Red Line Hollywood/Vine Station (located 600 feet from the Project Site). Many of the relevant projects are concentrated along key transportation corridors (i.e., Hollywood Boulevard and Sunset Boulevard) and within TPAs, and the majority of these projects are mixed-use in nature, combining multi-family residential with commercial uses. Of the relevant projects, there are 10 immediately

surrounding the Project Site, also within a TPA, that similarly consist of mixed-use residential and commercial, hotel, and office land uses. The related projects represent mixed-use, urban infill, and while they would increase density in the area, related projects would be evaluated for consistency with existing and proposed zoning and land use designations for given properties.

The Project, together with the related projects, would provide a range of much needed housing and high-quality neighborhood and visitor-serving commercial and entertainment uses concentrated within a Regional Center that would not conflict with the applicable plans and goals to concentrate high-density, mixed-use development in TPAs. **Therefore, the Project's or the Project with the East Site Hotel Option's contribution to cumulative impacts would not be cumulatively considerable. As such, cumulative impacts with respect to land use and planning would be less than significant**.

(2) Mitigation Measures

Cumulative impacts regarding land use and planning were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Cumulative impacts regarding land use and planning were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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IV. Environmental Impact Analysis

I. Noise

1. Introduction

This section analyzes potential noise and vibration impacts that could result from the Project. The analysis describes the existing noise environment within the Project area, estimates future noise and vibration levels at surrounding land uses associated with construction and operation of the Project, assesses the potential for significant impacts, and identifies mitigation measures to address any potential significant impacts. An evaluation of the potential cumulative noise impacts of the Project and related projects is also provided. The Project's noise and vibration impacts associated with on-site construction equipment were evaluated in a Construction Noise & Vibration Impact Study, prepared by Acoustical Engineering Services, Inc. (AES). Information from that assessment is incorporated herein and the report is included in Appendix K-1 of this Draft EIR. Additional noise worksheets and technical information and data used in the off-site construction noise and vibration analyses and on-site and off-site operational noise and vibration analyses prepared by ESA are included in the Noise and Vibration Technical Appendix and are also included in Appendix K-2 of this Draft EIR. The mobile source noise analysis is based on traffic data included in the Transportation Assessment (TA) prepared by Fehr & Peers, dated March 2020, which is included in Appendix N-1 of this Draft EIR.

2. Environmental Setting

a) Noise and Vibration Basics

(1) Noise

(a) Noise Principles and Descriptors

Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air). Noise is generally defined as unwanted sound (i.e., loud, unexpected, or annoying sound). Acoustics is defined as the physics of sound. In acoustics, the fundamental scientific model consists of a sound (or noise) source, a receiver, and the propagation path between the two. The loudness of the noise source and obstructions or atmospheric factors affecting the propagation path to the receiver determine the sound level and characteristics of the noise perceived by the receiver. Acoustics addresses primarily the propagation and control of sound.[1]

[1] M. David Egan, *Architectural Acoustics*, March 1988, Chapter 1, pages 2, 3, 10, and 11.

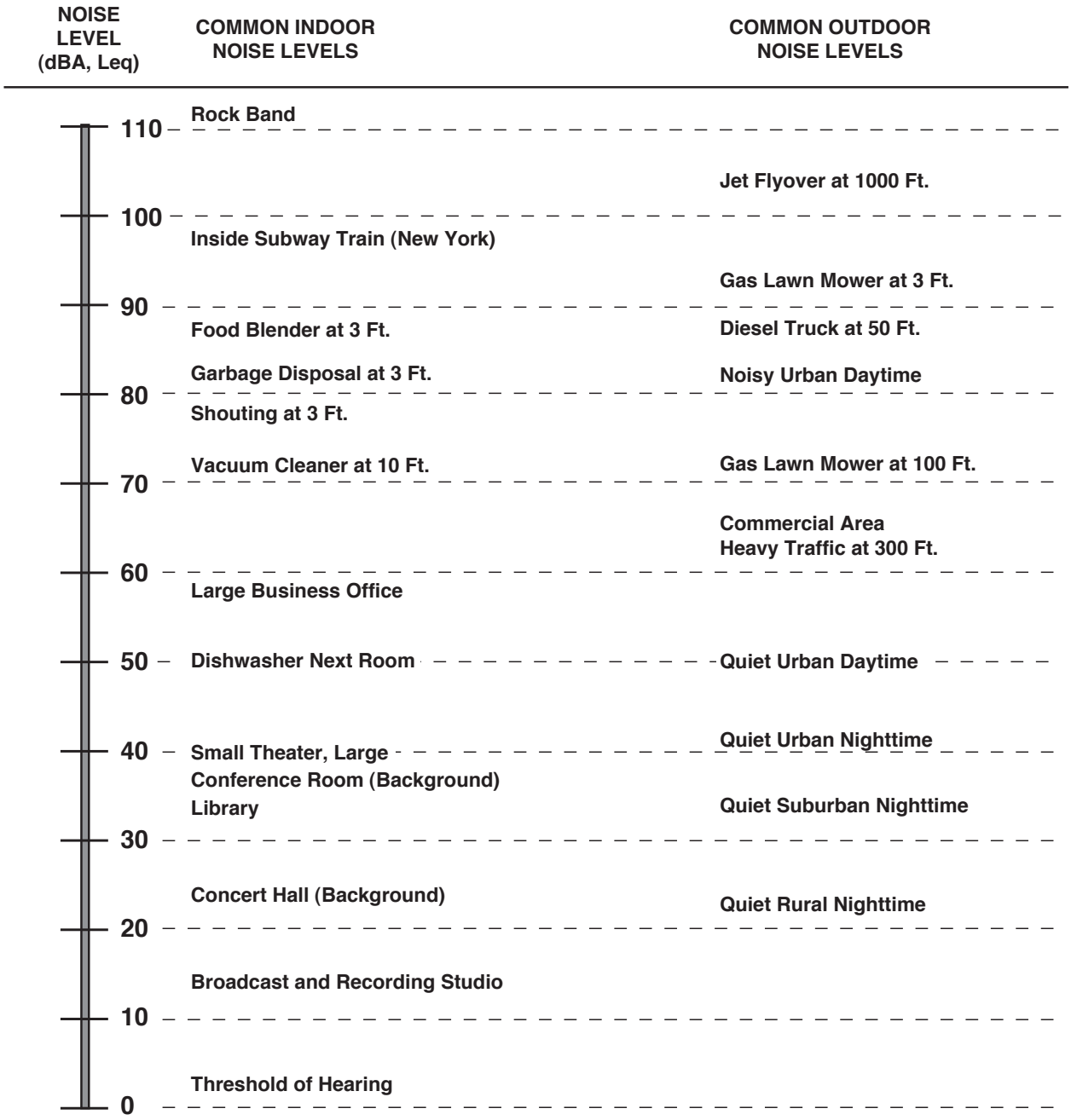
Sound, traveling in the form of waves from a source, exerts a sound pressure level (referred to as sound level) that is measured in decibels (dB), which is the standard unit of sound amplitude measurement. The dB scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound, with 0 dB corresponding roughly to the threshold of human hearing and 120 to 140 dB corresponding to the threshold of pain. Pressure waves traveling through air exert a force registered by the human ear as sound.[2]

Sound pressure fluctuations can be measured in units of hertz (Hz), which correspond to the frequency of a particular sound. Typically, sound does not consist of a single frequency but, rather, a broad band of frequencies varying in levels of magnitude, with audible frequencies of the sound spectrum ranging from 20 to 20,000 Hz. The sound pressure level, therefore, constitutes the additive force exerted by a sound corresponding to the sound frequency/sound power level spectrum.[3] The typical human ear is not equally sensitive to this frequency range. As a consequence, when assessing potential noise impacts, sound is measured using an electronic filter that deemphasizes the frequencies below 1,000 Hz and above 5,000 Hz in a manner corresponding to the human ear's decreased sensitivity to these extremely low and extremely high frequencies. This method of frequency filtering or weighting is referred to as A-weighting, expressed in units of A-weighted decibels (dBA), which is typically applied to community noise measurements.[4] Some representative common outdoor and indoor noise sources and their corresponding A-weighted noise levels are shown in **Figure IV.I-1**, *Decibel Scale and Common Noise Sources*.

(b) Noise Exposure and Community Noise

An individual's noise exposure is a measure of noise over a period of time; a noise level is a measure of noise at a given instant in time. However, noise levels rarely persist at that level over a long period of time. Rather, community noise varies continuously over a period of time with respect to the sound sources contributing to the community noise environment. Community noise is primarily the product of many distant noise sources, which constitute a relatively stable background noise exposure, with many of the individual contributors unidentifiable. The background noise level changes throughout a typical day but does so gradually, corresponding with the addition and subtraction of distant noise sources, such as changes in traffic volume. What makes community noise variable throughout a day, besides the slowly changing background noise, is the addition of short-duration, single-event noise sources (e.g., aircraft flyovers, motor vehicles, sirens), which are readily identifiable to the individual.[5]

2 M. David Egan, *Architectural Acoustics*, March 1988, Chapter 1, pages 2, 3, 10, and 11.
3 M. David Egan, *Architectural Acoustics*, March 1988, Chapter 1, pages 2, 3, 10, and 11.
4 M. David Egan, *Architectural Acoustics*, March 1988, Chapter 1, pages 2, 3, 10, and 11.
5 California Department of Transportation (Caltrans), *Technical Noise Supplement (TeNS)*, September 2013, Section 2.2.2.1.



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SOURCE: Caltrans

Hollywood Center Project

Figure IV.I-1
Decibel Scale and Common Noise Sources

These successive additions of sound to the community noise environment change the community noise level from instant to instant, requiring the noise exposure to be measured over periods of time to legitimately characterize a community noise environment and evaluate cumulative noise impacts. The following noise descriptors are used to characterize environmental noise levels over time, which are applicable to the Project:[6]

L_{eq}: The equivalent sound level over a specified period of time, typically, 1 hour (L_{eq}). The L_{eq} may also be referred to as the average sound level.

L_{max}: The maximum, instantaneous noise level experienced during a given period of time.

L_{min}: The minimum, instantaneous noise level experienced during a given period of time.

L_x: The noise level exceeded a percentage of a specified time period. For instance, L_{50} and L_{90} represent the noise levels that are exceeded 50 percent and 90 percent of the time, respectively.

L_{dn}: The average A-weighted noise level during a 24-hour day, obtained after an addition of 10 dB to measured noise levels between the hours of 10:00 P.M. to 7:00 A.M. to account for nighttime noise sensitivity. The L_{dn} is also termed the day-night average noise level (DNL).

CNEL: The Community Noise Equivalent Level (CNEL) is the average A-weighted noise level during a 24-hour day that includes an addition of 5 dB to measured noise levels between the hours of 7:00 A.M. to 10:00 P.M. and an addition of 10 dB to noise levels between the hours of 10:00 P.M. to 7:00 A.M. to account for noise sensitivity in the evening and nighttime, respectively.

(c) Effects of Noise on People

Noise is generally loud, unpleasant, unexpected, or undesired sound that is typically associated with human activity that is a nuisance or disruptive. The effects of noise on people can be placed into four general categories:

- Subjective effects (e.g., dissatisfaction, annoyance);
- Interference effects (e.g., communication, sleep, and learning interference);
- Physiological effects (e.g., startled response); and
- Physical effects (e.g., hearing loss).

Although exposure to high noise levels has been demonstrated to cause physical and physiological effects, the principal human responses to typical environmental noise exposure are related to subjective effects and interference with activities. Interference effects interrupt daily activities and include interference with human communication

6 Caltrans, *TeNS*, September 2013, Section 2.2.2.2.

activities, such as normal conversations, watching television, telephone conversations, and sleep. Sleep interference effects can include both awakening and arousal to a lesser state of sleep.[7]

With regard to the subjective effects, the responses of individuals to similar noise events are diverse and influenced by many factors, including the type of noise, the perceived importance of the noise, the appropriateness of the noise to the setting, the duration of the noise, the time of day and the type of activity during which the noise occurs, and individual noise sensitivity. A wide variation in individual thresholds of annoyance exists, and different tolerances to noise tend to develop based on an individual's past experiences with noise. Thus, an important way of predicting a human reaction to a new noise environment is the way it compares to the existing environment to which one has adapted (i.e., comparison to the ambient noise environment). In general, the more a new noise level exceeds the previously existing ambient noise level, the less acceptable the new noise level will be judged by those hearing it. With regard to increases in A-weighted noise level, the following relationships generally occur:[8]

- Except in carefully controlled laboratory experiments, a change of 1 dBA in ambient noise levels cannot be perceived;
- Outside of the laboratory, a 3 dBA change in ambient noise levels is considered to be a barely perceivable difference;
- A change in ambient noise levels of 5 dBA is considered to be a readily perceivable difference; and
- A change in ambient noise levels of 10 dBA is subjectively heard as doubling of the perceived loudness.

These relationships occur in part because of the logarithmic nature of sound and the decibel scale. The human ear perceives sound in a non-linear fashion; therefore, the dBA scale was developed. Because the dBA scale is based on logarithms, two noise sources do not combine in a simple additive fashion but, rather, logarithmically. Under the dBA scale, a doubling of sound energy corresponds to a 3 dBA increase. In other words, when two sources are each producing sound of the same loudness, the resulting sound level at a given distance would be approximately 3 dBA higher than one of the sources under the same conditions. For example, if two identical noise sources produce noise levels of 50 dBA, the combined sound level would be 53 dBA, not 100 dBA. Under the dB scale, three sources of equal loudness together produce a sound level of approximately 5 dBA louder than one source, and ten sources of equal loudness together produce a sound level of approximately 10 dBA louder than the single source.[9]

7 Caltrans, *TeNS*, September 2013, Section 2.2.1.
8 Caltrans, *TeNS*, September 2013, Section 2.2.1.
9 Caltrans, *TeNS*, September 2013, Section 2.2.1.1.

(d) Noise Attenuation

When noise propagates over a distance, the noise level reduces with distance depending on the type of noise source and the propagation path. Noise from a localized source (i.e., point source) propagates uniformly outward in a spherical pattern, referred to as "spherical spreading." Noise levels generated by stationary point sources, including stationary mobile sources, such as idling vehicles, are attenuated at a rate between 6 dBA for acoustically "hard" sites and 7.5 dBA for "soft" sites for each doubling of distance from the reference measurement, as their energy is continuously spread out over a spherical surface (e.g., for hard surfaces, 80 dBA at 50 feet attenuates to 74 dBA at 100 feet, 68 dBA at 200 feet, etc.). Hard sites are those with a reflective surface between the source and the receiver, such as asphalt or concrete surfaces or smooth bodies of water. No excess ground attenuation is assumed for hard sites and the reduction in noise levels with distance (drop-off rate) is simply the geometric spreading of the noise from the source. Soft sites have an absorptive ground surface, such as soft dirt, grass, or scattered bushes and trees, which in addition to geometric spreading, provides an excess ground attenuation value of 1.5 dBA (per doubling distance).[10]

Roadways and highways consist of several localized noise sources on a defined path and, hence, are treated as "line" sources, which approximate the effect of several point sources. Noise from a line source propagates over a cylindrical surface, often referred to as "cylindrical spreading." Noise from line sources (e.g., traffic noise from vehicles) are attenuated at a rate between 3 dBA for hard sites and 4.5 dBA for soft sites for each doubling of distance from the reference measurement.[11] Therefore, noise due to a line source is attenuated less with distance than that of a point source with increased distance.

Additionally, receptors located downwind from a noise source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lowered noise levels. Atmospheric temperature inversion (i.e., increasing temperature with elevation) can increase sound levels at long distances (e.g., more than 500 feet). Other factors, such as air temperature, humidity, and turbulence, can also have an effect on noise levels.[12]

(2) Foundations of Vibration

Vibration can be interpreted as energy transmitted in waves through the ground or man-made structures, which generally dissipate with distance from the vibration source. Because energy is lost during the transfer of energy from one particle to another, vibration becomes less perceptible with increasing distance from the source.

10 Caltrans, *TeNS*, September 2013, Section 2.1.4.2.
11 Caltrans, *TeNS*, September 2013, Section 2.1.4.1.
12 Caltrans, *TeNS*, September 2013, Section 2.1.4.3.

As described in the Federal Transit Administration's (FTA) Transit Noise and Vibration Impact Assessment Manual, common sources of groundborne vibration are trains, heavy trucks traveling on rough roads and construction activities, such as pile-driving and operation of heavy earth-moving equipment.[13]

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal in inches per second (in/sec), and is most frequently used to describe vibration impacts to buildings. The root mean square (RMS) amplitude is defined as the average of the squared amplitude of the signal and is most frequently used to describe the effect of vibration on the human body. Decibel notation (VdB) is commonly used to measure RMS. The relationship of PPV to RMS velocity is expressed in terms of the "crest factor," defined as the ratio of the PPV amplitude to the RMS amplitude. PPV is typically a factor of 1.7 to 6 times greater than RMS vibration velocity.[14] The decibel notation VdB acts to compress the range of numbers required to describe vibration. Typically, groundborne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receptors for vibration include buildings where vibration would interfere with operations within the building or cause damage (especially historic buildings and older non-engineered timber and masonry structures), locations where people sleep, and locations with vibration sensitive equipment.[15]

The effects of groundborne vibration include movement of the building floors, rattling of windows, shaking of items on shelves or hanging on walls, and rumbling sounds. In extreme cases, the vibration can cause damage to buildings. Building damage is not a factor for most projects, with the occasional exception of blasting and pile-driving during construction or when construction is immediately adjacent to a fragile historic resource. Annoyance from vibration often occurs when the vibration levels exceed the threshold of perception by only a small margin. A vibration level that causes annoyance will be well below the damage threshold for normal buildings.

b) Regulatory Framework

(1) Federal

(a) Federal Noise Standards

There are no federal noise standards that directly regulate environmental noise related to the construction or operation of the Project.

Under the Occupational Safety and Health Act of 1970 (29 U.S.C. §1919 et seq.), the Occupational Safety and Health Administration (OSHA) has adopted regulations designed to protect workers against the effects of occupational noise exposure. These

[13] Federal Transit Administration (FTA), *Transit Noise and Vibration Impact Assessment Manual*, 2018, Section 5.2 and Figure 5-4.
[14] FTA, *Transit Noise and Vibration Impact Assessment Manual*, 2018, Section 5.1.
[15] FTA, *Transit Noise and Vibration Impact Assessment Manual*, 2018, Section 6.1, 6.2, and 6.3.

regulations list permissible noise level exposure as a function of the amount of time during which the worker is exposed. The regulations further specify a hearing conservation program that involves monitoring the noise to which workers are exposed, ensuring that workers are made aware of overexposure to noise, and periodically testing the workers' hearing to detect any degradation.

(b) Federal Vibration Standards

There are no federal vibration standards or regulations adopted by any agency that are applicable to evaluating vibration impacts from land use development projects such as the Project. However, FTA has adopted vibration criteria that are commonly used to evaluate potential structural damage to buildings by building category from construction activities. The vibration damage criteria adopted by FTA are shown in **Table IV.I-1,** *Construction Vibration Damage Criteria*.

TABLE IV.I-1
CONSTRUCTION VIBRATION DAMAGE CRITERIA

Building Category	PPV (in/sec)
I. Reinforced-concrete, steel, or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

SOURCE: FTA, *Transit Noise and Vibration Impact Assessment*, 2018.

FTA has also adopted vibration criteria associated with the potential for human annoyance from groundborne vibration for the following three land-use categories: Category 1 – High Sensitivity, Category 2 – Residential, and Category 3 – Institutional, as shown in **Table IV.I-2**, *Groundborne Vibration Impact Criteria for General Assessment*. FTA defines Category 1 as buildings where vibration would interfere with operations within the building, including vibration-sensitive research and manufacturing facilities, hospitals with vibration-sensitive equipment, and university research operations. Vibration-sensitive equipment includes, but is not limited to, electron microscopes, high-resolution lithographic equipment, and normal optical microscopes. Category 2 refers to all residential land uses and any buildings where people sleep, such as hotels and hospitals. Category 3 refers to institutional land uses such as schools, churches, other institutions, and quiet offices that do not have vibration-sensitive equipment but still have the potential for activity interference. The FTA uses a screening distance of 100 feet for highly vibration-sensitive buildings (e.g., historic buildings, hospitals with vibration sensitive equipment, Category 1) and 50 feet for residential uses (Category 2).[16] No vibration criteria have been adopted or recommended by FTA for commercial and office uses.

[16] FTA, *Transit Noise and Vibration Impact Assessment Manual*, 2018, Table 6-8.

TABLE IV.I-2
GROUNDBORNE VIBRATION IMPACT CRITERIA FOR GENERAL ASSESSMENT

Land Use Category	Frequent Events[a]	Occasional Events[b]	Infrequent Events[c]
Category 1: Buildings where vibration would interfere with interior operations.	65 VdB[d]	65 VdB[d]	65 VdB[d]
Category 2: Residences and buildings where people normally sleep.	72 VdB	75 VdB	80 VdB
Category 3: Institutional land uses with primarily daytime use.	75 VdB	78 VdB	83 VdB

[a] "Frequent Events" is defined as more than 70 vibration events of the same source per day.

[b] "Occasional Events" is defined as between 30 and 70 vibration events of the same source per day.

[c] "Infrequent Events" is defined as fewer than 30 vibration events of the same kind per day.

[d] This criterion is based on levels that are acceptable for most moderately sensitive equipment, such as optical microscopes.

SOURCE: FTA, Transit Noise and Vibration Impact Assessment, 2018.

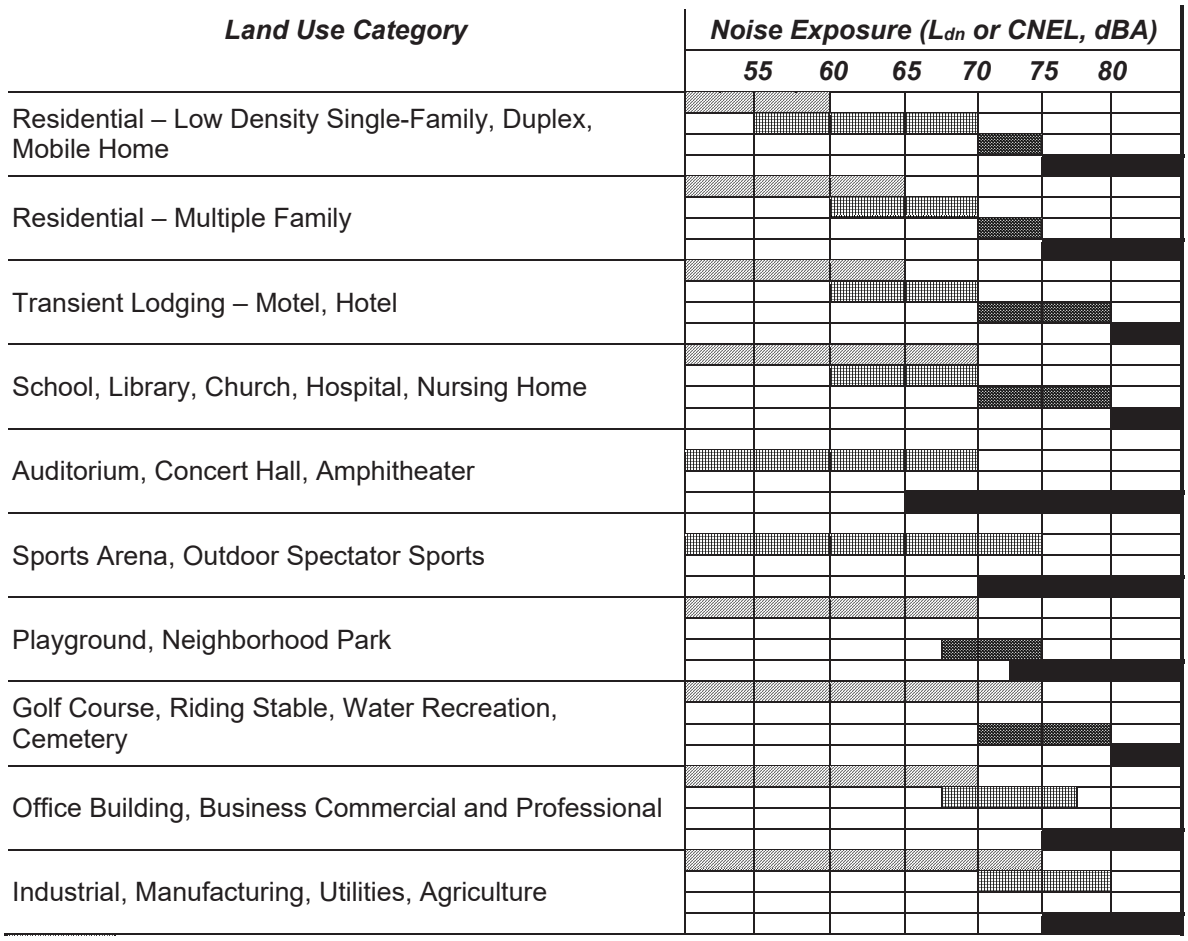
(2) State

(a) California Noise Standards

The State of California does not have standards for environmental noise, but the Governor's Office of Planning and Research (OPR) has established general plan guidelines for evaluating the compatibility of various land uses as a function of community noise exposure, as presented in **Figure IV.I-2**, *Guideline for Noise Compatible Land Use*.[17] The purpose of these guidelines is to maintain acceptable noise levels in a community setting for different land use types. Noise compatibility by different land uses types is categorized into four general levels: "normally acceptable," "conditionally acceptable," "normally unacceptable," and "clearly unacceptable." For instance, a noise environment ranging from 50 dBA CNEL to 65 dBA CNEL is considered to be "normally acceptable" for multi-family residential uses, while a noise environment of 75 dBA CNEL or above for multi-family residential uses is considered to be "clearly unacceptable."

In addition, California Government Code Section 65302(f) requires each county and city in the State to prepare and adopt a comprehensive long-range general plan for its physical development, with California Government Code Section 65302(f) requiring a noise element to be included in the general plan. The noise element must: (1) identify and appraise noise problems in the community; (2) recognize Office of Noise Control guidelines; and (3) analyze and quantify current and projected noise levels.

[17] State of California Governor's Office of Planning and Research, *General Plan Guidelines*, 2003.



NORMALLY ACCEPTABLE: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

CONDITIONALLY ACCEPTABLE: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design.

NORMALLY UNACCEPTABLE: New construction or development should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirement must be made and needed noise insulation features included in the design.

CLEARLY UNACCEPTABLE: New construction or development should generally not be undertaken. Construction costs to make the indoor environmental acceptable would be prohibitive and the outdoor environment would not be usable.

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SOURCE: State of California, General Plan Guidelines, Governor's Office of Planning and Research, 2003

Hollywood Center Project

Figure IV.I-2
Guidelines for Noise Compatible Land Use

The State of California has also established noise insulation standards for new multi-family residential units, hotels, and motels that would be subject to relatively high levels of transportation-related noise. These requirements are collectively known as the California Noise Insulation Standards (Title 24, California Code of Regulations). The noise insulation standards set forth an interior standard of 45 dBA CNEL in any habitable room. They require an acoustical analysis demonstrating how dwelling units have been designed to meet this interior standard where such units are proposed in areas subject to noise levels greater than 60 dBA CNEL. Title 24 standards are typically enforced by local jurisdictions through the building permit application process.

(a) California Vibration Standards

The State of California has not adopted statewide standards or regulations for evaluating vibration or groundborne noise impacts from land use development projects such as the Project.

(3) Local

(a) Noise Element

The Noise Element of the City's General Plan establishes CNEL guidelines for land use compatibility, which are also provided in the City's 2006 L.A. CEQA Thresholds Guide and as shown in **Table IV.I-3**, *City of Los Angeles Land Use Compatibility for Community Noise*. The Noise Element includes a number of goals, objectives, and policies for land use planning purposes. The overall purpose of the Noise Element of the City's General Plan is to guide policymakers in making land use determinations and in preparing noise ordinances that would limit exposure of citizens to excessive noise levels. The following goals, policies, and objectives from the Noise Element of the General Plan are applicable to the Project.[18]

Goal: A city where noise does not reduce the quality of urban life.

Objective 2 (Non-airport): Reduce or eliminate non-airport related intrusive noise, especially relative to noise sensitive uses.

Policy 2.2: Enforce and/or implement applicable city, state, and federal regulations intended to mitigate proposed noise producing activities, reduce intrusive noise and alleviate noise that is deemed a public nuisance.

Objective 3 (Land Use Development): Reduce or eliminate noise impact associated with proposed development of land and changes in land use.

Policy 3.1: Develop land use policies and programs that will reduce or eliminate potential and existing noise impacts.

[18] City of Los Angeles, *Noise Element of the General Plan*, adopted February 3, 1999.

TABLE IV.I-3
CITY OF LOS ANGELES LAND USE COMPATIBILITY FOR COMMUNITY NOISE

Land Use	Community Noise Exposure CNEL (dBA)			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Single-Family, Duplex, Mobile Homes	50 to 60	55 to 70	70 to 75	Above 70
Multi-Family Homes	50 to 65	60 to 70	70 to 75	Above 70
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 to 70	60 to 70	70 to 80	Above 80
Transient Lodging—Motels, Hotels	50 to 65	60 to 70	70 to 80	Above 80
Auditoriums, Concert Halls, Amphitheaters	—	50 to 70	—	Above 65
Sports Arena, Outdoor Spectator Sports	—	50 to 75	—	Above 70
Playgrounds, Neighborhood Parks	50 to 70	—	67 to 75	Above 72
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 to 75	—	70 to 80	Above 80
Office Buildings, Business and Professional Commercial	50 to 70	67 to 77	Above 75	—
Industrial, Manufacturing, Utilities, Agriculture	50 to 75	70 to 80	Above 75	—

Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.

Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

Clearly Unacceptable: New construction or development should generally not be undertaken.

SOURCE: City of Los Angeles, 2006 L.A. CEQA Thresholds Guide, 2006.

(b) Los Angeles Municipal Code

The City also has regulations to control unnecessary, excessive, and annoying noise, as set forth in Chapter XI, Noise Regulation, of the Los Angeles Municipal Code (LAMC). The City's Noise Regulation establishes acceptable ambient sound levels to regulate intrusive noises (e.g., stationary mechanical equipment and vehicles other than those traveling on public streets) within specific land use zones and provides procedures and

criteria for the measurement of the sound level of noise sources. These procedures recognize and account for differences in the perceived level of different types of noise and/or noise sources.

LAMC Sections 111.01 and 111.03 define the ambient noise as the actual measured ambient noise level or the City's presumed ambient noise level, whichever is greater. The actual ambient noise level is the measured noise level averaged over a period of at least 15 minutes L_{eq}.

LAMC Section 111.02 provides procedures and criteria for the measurement of the sound level of "offending" noise sources. In accordance with the LAMC, a noise level increase of 5 dBA over the existing average ambient noise level at an adjacent property line is considered a noise violation. To account for people's increased tolerance for short-duration noise events, the Noise Regulation provides a 5 dBA allowance for noise occurring more than five but less than fifteen minutes in any one-hour period and an additional 5 dBA allowance (total of 10 dBA) for noise occurring five minutes or less in any one-hour period.[19]

LAMC Section 112.01 prohibits noise from any radio, musical instrument, phonograph, television receiver, or other machine or device for the producing, reproducing or amplification of the human voice, music, or any other sound, in such a manner, as to disturb the peace, quiet, and comfort of neighbor occupants or any reasonable person residing or working in the area or that exceeds the ambient noise level on the premises of any other occupied property, or if a condominium, apartment house, duplex, or attached business, within any adjoining unit, by more than 5 dBA.

LAMC Section 112.02 limits increases in noise levels from air conditioning, refrigeration, heating, pumping and filtering equipment. Such equipment may not be operated in such manner as to create any noise which would cause the noise level on the premises of any other occupied property, or, if a condominium, apartment house, duplex, or attached business, within any adjoining unit, to exceed the ambient noise level by more than 5 dBA.

LAMC Section 112.05 sets a maximum noise level for construction equipment of 75 dBA at a distance of 50 feet when operated within 500 feet of a residential zone. Compliance with this standard is required only where "technically feasible."[20]

LAMC Section 41.40 prohibits construction between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, 6:00 P.M. and 8:00 A.M. on Saturday, and at any time on Sunday (i.e., construction is allowed Monday through Friday between 7:00 A.M. to 9:00 P.M.; and Saturdays and National Holidays between 8:00 A.M. to 6:00 P.M.). In general, the City's Department of Building and Safety enforces noise ordinance provisions relative to

19 LAMC, Chapter XI, Article I, Section 111.02(b).

20 In accordance with the City's Noise Ordinances, "technically feasible" means that the established noise limitations can be complied with at a project site, with the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques employed during the operation of equipment.

equipment and the Los Angeles Police Department enforces provisions relative to noise generated by people.

LAMC Section 113.01 prohibits collecting or disposing of rubbish or garbage, operating any refuse disposal truck, or collecting, loading, picking up, transferring, unloading, dumping, discarding, or disposing of any rubbish or garbage, as such terms are defined in LAMC Section 66.00, within 200 feet of any residential building between the hours of 9:00 P.M. and 6:00 A.M. of the following day, unless a permit therefore has been duly obtained beforehand from the Board of Police Commissioners.

(c) Guidelines for Noise-Compatible Land Uses

The 2006 L.A. CEQA Thresholds Guide provides thresholds for determining significant noise impacts of a project. These standards are described further below. The City has adopted local guidelines based, in part, on the community noise compatibility guidelines established by OPR for use in assessing the compatibility of various land use types with a range of noise levels. These guidelines are set forth in the 2006 City of L.A. Thresholds Guide in terms of the CNEL. CNEL guidelines for specific land uses are classified into four categories: (1) "normally acceptable," (2) "conditionally acceptable," (3) "normally unacceptable," and (4) "clearly unacceptable." As shown in Table IV.I-3, a CNEL value of 70 dBA is the limit of what is considered a "conditionally acceptable" noise environment for multi-family residential uses, although the limit of what is considered "normally acceptable" for multi-family residential uses is set at 65 dBA CNEL.[21] The limit of what is considered "normally acceptable" for playgrounds and neighborhood parks is 70 dBA.[22] New development should generally be discouraged within the "normally unacceptable" or "clearly unacceptable" categories. However, if new development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

(d) Vibration

The City of Los Angeles has not adopted standards or regulations addressing groundborne vibration or groundborne noise impacts from land use development projects, such as the Project.

c) Existing Conditions

(1) Noise-Sensitive Receptor Locations

Some land uses are considered more sensitive to noise than others due to the types of activities typically involved at the receptor location and the effect that noise can have on those activities and the persons engaged in them. The City's 2006 L.A. CEQA Thresholds

[21] City of Los Angeles, *2006 L.A. CEQA Thresholds Guide*, 2006, Section I.2.
[22] City of Los Angeles, *2006 L.A. CEQA Thresholds Guide*, 2006, Section I.2.

Guide states that residences, schools, motels and hotels, libraries, religious institutions, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks are generally more sensitive to noise than commercial and industrial land uses.[23] Only pre-school, elementary, middle, and high schools are considered to be noise-sensitive receptors. Existing noise-sensitive uses, or receptors, within 500 feet of the Project Site include the following 13 off-site noise-sensitive receptors, as shown in **Figure IV.I-3**, *Noise-Sensitive Receptor Locations*:

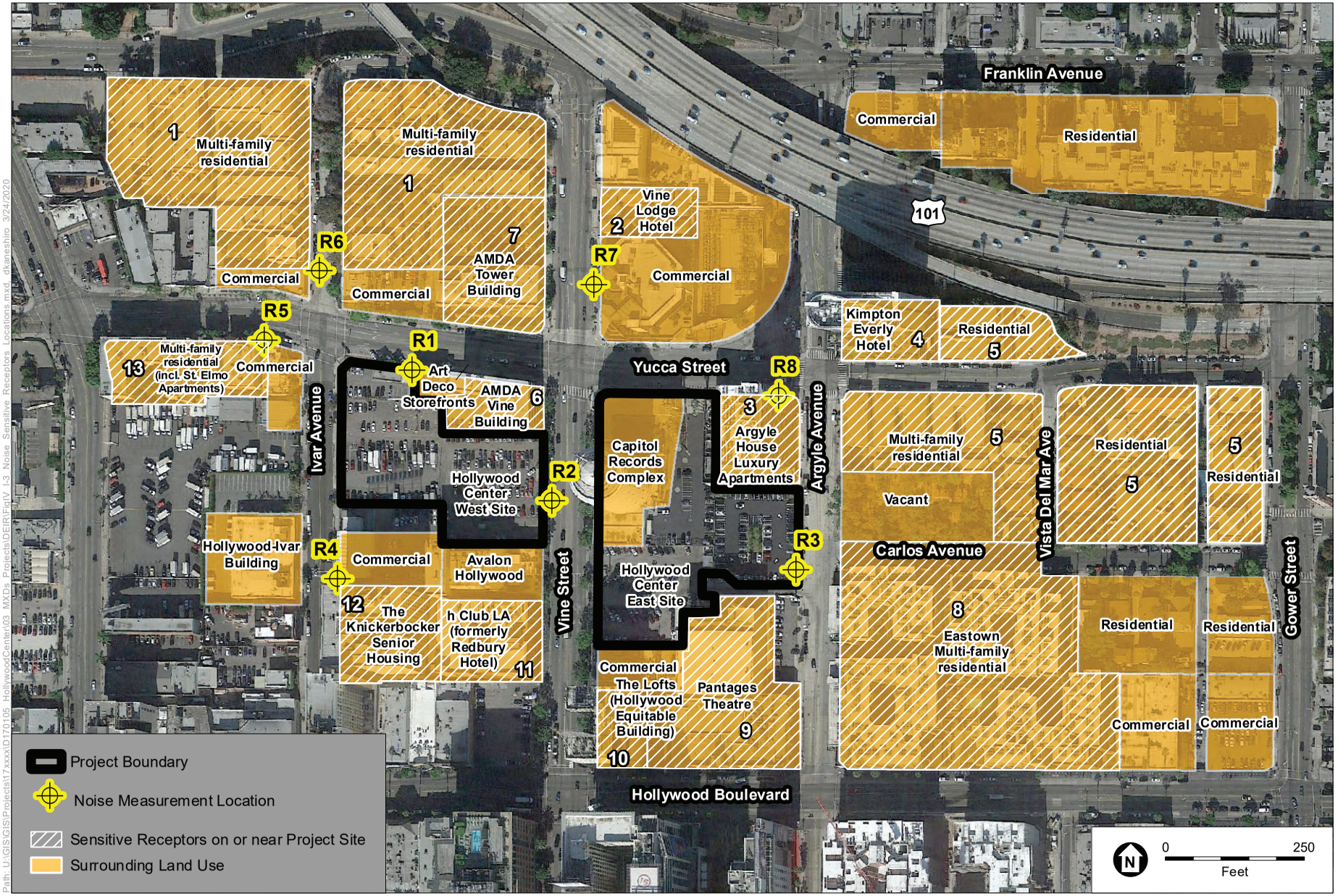
1. Multi-family residential uses along Ivar Avenue and north of Yucca Street. Approximately 170 feet from the West Site and 350 feet from the East Site construction area.
2. Vine Lodge Hotel along Vine Street approximately 360 feet from the West Site and 280 feet from the East Site construction area.
3. Argyle House (apartments) at the southwest corner of Yucca Street and Argyle Avenue approximately 300 feet from the West Site and immediately adjacent to the East Site construction area.
4. Kimpton Everly Hotel at the northeast corner of Yucca Street and Argyle Avenue approximately 550 feet from the West Site and 230 feet from the East Site construction area.
5. Multi-family residential uses to the east of Argyle Avenue approximately 530 feet from the West Site and 80 feet from the East Site construction area.
6. American Music and Dramatic Academy (AMDA) Vine Building[24] immediately adjacent to the West Site and approximately 220 feet from the East Site construction area.
7. The AMDA Tower Building[25] is located on the northwest corner of Yucca Street and Vine Street and approximately 125 feet from the West Site and 295 feet from the East Site construction area.
8. Eastown multi-family residential uses to the east of Argyle Avenue approximately 530 feet from the West Site and 80 feet from the East Site construction area.
9. Pantages Theatre approximately 280 feet southeast of the West Site and adjacent to the south of the East Site construction area.[26]

[23] City of Los Angeles, *2006 L.A. CEQA Thresholds Guide*, 2006, page I.1-3.

[24] While AMDA is not a pre-school, elementary, middle, or high school, the AMDA admissions policy indicates they accept applications from juniors and seniors in high school. Given the location of the AMDA Vine Building in proximity to the West Site and East Site, the AMDA Vine Building is included as a sensitive receptor for the purposes of the noise analysis for this Project.

[25] While AMDA is not a pre-school, elementary, middle, or high school, the AMDA admissions policy indicates they accept applications from juniors and seniors in high school. Given the location of the AMDA Tower Building in proximity to the Project West Site and East Site, the AMDA Tower Building is included as a sensitive receptor for the purposes of the noise analysis for this Project.

[26] Pantages Theatre hosts matinee and nighttime concerts. The theatre is an auditorium and/or concert hall and is therefore considered a sensitive receptor under the City's 2006 L.A. CEQA Thresholds Guide.



SOURCE: Google Earth, 2017

Hollywood Center Project

Figure IV.I-3
Noise-Sensitive Receptor Locations

10. The Lofts (Hollywood Equitable Building) at Hollywood Boulevard and Vine Street includes multi-family residential uses to the east of Vine Street approximately 280 feet southeast of the West Site and 100 feet south of the East Site construction area.
11. h Club Los Angeles to the west of Vine Street approximately 100 feet south of the West Site and 90 feet west of the East Site construction area.
12. The Knickerbocker Senior Residential use to the east of Ivar Avenue approximately 90 feet south of the West Site and 300 feet west of the East Site construction area.
13. Multi-family residential uses (including the St. Elmo Apartments at 6358 Yucca Street) to the west of Ivar Avenue approximately 140 feet west of the West Site and 650 feet west of the East Site construction area.

All other noise-sensitive uses regulated by the City are located at greater distances from the Project Site and would experience lower noise levels from potential sources of noise on the Project Site due to distance loss. There are no pre-school, elementary, middle, or high schools within 500 feet of the Project Site (see Figure IV.I-3).

(2) Vibration Receptor Locations

Typically, groundborne vibration generated by man-made activities (e.g., rail and roadway traffic, operation of mechanical equipment, and typical construction equipment) diminishes rapidly with distance from the vibration source. Construction activities, such as impact pile driving, would have the greatest effect on vibration sensitive land uses. With respect to potential structural damage, structures in close proximity to the Project Site, including a number of historic structures, are considered vibration sensitive receptors. **Table IV.I-4**, *Vibration Receptors*, lists the surrounding vibration receptors categorized by those near to the West Site and the East Site while also separately listing those that are historic structures. Although the Capitol Records Complex is located within the Project Site, it is included in the vibration analysis due to the potential for structural damage to a historical resource.[27] Vibration receptors are also shown in **Figure IV.I-4**, *Vibration Receptor Locations*.

With respect to human annoyance, off-site sensitive land uses include buildings, in which vibration-sensitive equipment is used (e.g., hospitals, research, medical offices, and manufacturing); residential land uses and buildings, where people normally sleep; schools; and churches. Industrial or commercial (including office) uses are not considered vibration-sensitive.[28] All of the off-site sensitive receptors listed above in Subsection IV.I.2(c)(1), *Noise-Sensitive Receptor Locations*, were analyzed for impacts related to vibration-related human annoyance.

[27] The Capitol Records Complex is located on-site within the Project's East Site and is an Applicant-controlled facility. Therefore, the Capitol Records Complex is not considered an off-site receptor for evaluating impacts to the environment. For the purposes of the noise and vibration analysis in the Draft EIR, the Capitol Records Complex is evaluated for potential structural vibration damage as it is a historical resource.

[28] FTA, *Transit Noise and Vibration Impact Assessment Manual*, 2018, Table 6-1.

TABLE IV.I-4
VIBRATION RECEPTORS

Location No.[a]	Building Structure Nearest to Project Site[b]	FTA Building Category[c]
Project West Site		
6	North – AMDA Vine building	Category I
14	North – Art Deco Building at 6314-24 Yucca Street	Category IV
15	South – Avalon Hollywood	Category IV
16 and 17	West – Single-story commercial buildings on west side of Ivar Avenue (6340 Yucca Street, 1763 Ivar Avenue, and the Hollywood-Ivar Building at 1741 Ivar Avenue)	Category III
18 and 19	East – Capitol Records Complex (Capitol Records Building and Gogerty Building located on-site within the Project East Site)	Category I
Project East Site		
3	North – Argyle House at the southwest corner of Yucca Street/Argyle Avenue	Category I
8	East – Eastown multi-family residential buildings	Category I
9	South – Pantages Theatre	Category IV
20	South – Single-story commercial building at 1718 N. Vine Street	Category III
11	West – h Club LA	Category III
15	West – Avalon Hollywood	Category IV
Historic Structures		
9	Pantages Theatre	Category IV
10	The Lofts (Hollywood Equitable Building)	Category IV
13	St. Elmo Apartments at 6358 Yucca Street	Category IV
14	Art Deco Building at 6316-24 Yucca Street	Category IV
15	Avalon Hollywood	Category IV
17	Hollywood-Ivar Building at 1741 Ivar Avenue	Category IV
18 and 19	Capitol Records Complex (Capitol Records Building and Gogerty Building located on-site within the Project East Site)	Category IV

[a] Refer to Figure IV.I-3 for location number.

[b] Represents off-site building structures located nearest to the Project Site to the north, south, east and west.

[c] FTA's thresholds for structural damage, as further described in Subsection IV.I.3(a)(3), are as follows:

Category I: Reinforced concrete, steel, or timber (no plaster)

Category II: Engineered concrete and masonry (no plaster)

Category III: Non-engineered timber and masonry buildings

Category IV: Buildings extremely susceptible to building damage

SOURCE: AES, Construction Noise & Vibration Impact Study, March 2020. Provided in Appendix K-1 of this Draft EIR.

SOURCE: Google Earth, 2017

Hollywood Center Project

Figure IV.I-4
Vibration Sensitive Receptor Locations

(3) Ambient Noise Levels

The predominant existing noise source near the Project Site is roadway noise from Yucca Street, Vine Street, Hollywood Boulevard, and other major roadways in the surrounding area. Additionally, the Hollywood Freeway (US-101) located approximately 380 feet north of the East Site's northernmost boundary contributes to ambient noise levels. Other noise sources include general residential and commercial-related activities associated with trash collection activities, loading and unloading activities, and surface parking lots.

As discussed above, 13 off-site noise-sensitive receptor locations were identified to represent noise-sensitive uses within the Project area. The locations of the noise-sensitive receptors shown in Figure IV.I-3, are also listed in **Table IV.I-5,** *Summary of Ambient Noise Measurements at Noise Sensitive Receptors*, as Receptor Location 1 through 13 with the approximate distances to the West Site and East Site. Ambient noise levels were conducted at a total of eight (8) locations (R1 through R8 on Figure IV-I.3). The measured environmental noise levels at R1 through R8 represent the current ambient noise levels in the vicinity of the Project Site and are used to establish the existing ambient noise level at the noise-sensitive receptors within the Project area. Some of the noise measurement locations represent noise levels at multiple noise sensitive receptor locations, as noted in Table IV.I-5. The existing ambient noise environment at all measurement locations currently exceed the City's presumed daytime ambient noise standard of 50 dBA (L_{eq}) for residential use. Therefore, consistent with LAMC procedures, the measured noise levels are used as the baseline conditions for the purposes of determining Project impacts.

(4) Existing Roadway Noise Levels

Since the original MOU for the Project Traffic Study was executed with LADOT in December 2016, the City adopted new Transportation Assessment Guidelines (TAG) in July 2019, which changed the focus of traffic analysis pursuant to CEQA from being primarily based on assessment of intersection levels of service (LOS) to one based primarily on vehicle miles traveled (VMT). Although the TA no longer evaluates LOS pursuant to CEQA, the 68 intersections identified in the original MOU with LADOT, and included in Appendix I of the TA, still serve as the basis for the mobile source noise analysis provided in this section of the EIR.[29] Existing roadway CNEL noise levels were calculated for roadway segments located with the study area, as defined by the original MOU with LADOT and were based on vehicular turning movement data at intersections identified for traffic impact analysis by the City. Turning movements at each studied intersection were used to determine traffic volumes along 162 roadway segments within the Project vicinity. These roadways, when compared to roadways located farther away from the Project Site, would experience the greatest percentage increase in traffic generated by the Project (i.e., as distances are increased from the Project Site, traffic is spread out over a greater geographic area, and its effects are reduced).

[29] Fehr & Peers, Transportation Assessment for the Hollywood Center Project, March 2020, Appendix I. Provided in Appendix N-1 of this Draft EIR.

TABLE IV.I-5
SUMMARY OF AMBIENT NOISE MEASUREMENTS AT NOISE SENSITIVE RECEPTORS

Receptor Location	Approximate Distance to Project Site, Feet		Measured Daytime Ambient Noise Levels,[a] dBA L_{eq}
	West Site	East Site	
1. Multi-family residential uses along Ivar Avenue, north of Yucca Street	170	350	59.9
2. Vine Lodge Hotel	360	280	73.0
3. Argyle House at southwest corner of Yucca Street/Argyle Avenue	300	Adjacent	68.3
4. Kimpton Everly Hotel at northeast corner of Yucca Street/Argyle Avenue	550	230	68.3
5. Multi-family residential uses east of Argyle Avenue	530	80	68.3
6. AMDA Vine Building	Adjacent	220	64.9
7. AMDA Tower Building	125	295	64.9
8. Eastown multi-family residential uses east of Argyle Avenue	530	80	60.1
9. Pantages Theatre	280	Adjacent	60.1
10. The Lofts (Hollywood Equitable Building) at Hollywood Boulevard/Vine Street	280	100	68.1
11. h Club Los Angeles (formerly Redbury Hotel)	100	90	68.1
12. The Knickerbocker Senior Residential	90	300	63.2
13. Multi-family uses (including the St. Elmo Apartments at 6358 Yucca Street) west of Ivar Avenue	140	650	62.7

[a] Based on measured ambient noise levels at measurement receptors R1 through R8:
- Measurements at R1 is applicable to receptor locations 6 and 7.
- Measurements at R2 is applicable to receptor locations 10 and 11.
- Measurements at R3 is applicable to receptor locations 8 and 9.
- Measurements at R4 is applicable to receptor location 12.
- Measurements at R5 is applicable to receptor location 13.
- Measurements at R6 is applicable to receptor location 1
- Measurements at R7 is applicable to receptor location 2
- Measurements at R8 is applicable to receptor locations 3, 4, and 5.

SOURCE: ESA, 2020.

Existing roadway CNEL noise levels were calculated using the Federal Highway Administration's (FHWA's) Highway Traffic Noise Model (FHWA TNM)[30] and traffic volumes at the study intersections reported in the TA. The TNM model calculates the average noise level at specific locations based on traffic volumes, average speeds, and site environmental conditions. The noise levels along these roadway segments are presented in **Table IV.I-6,** *Modeled Existing Vehicular Traffic Noise Levels*.

TABLE IV.I-6
MODELED EXISTING VEHICULAR TRAFFIC NOISE LEVELS

			CNEL (dBA)
Street	**Roadway Segment**	**Existing Land Uses Located along Roadway Segment**	**Existing (A)**
Argyle Ave	Between Franklin Ave and US-101 SB on-ramp	Commercial	65.3
Argyle Ave	Between Hollywood Blvd and Selma Ave	Residential/Commercial	64.2
Argyle Ave	Between US-101 SB on-ramp and Yucca St	Residential/Commercial	65.8
Argyle Ave	Between Selma Ave and Sunset Blvd	Residential/Commercial	63.6
Argyle Ave	Between Vine St/Dix St and Franklin Ave	Commercial	62.4
Argyle Ave	Between Yucca St and Hollywood Blvd	Residential/Commercial	65.0
Argyle Ave	North of Vine St/Dix St	Residential	56.3
Bronson Ave	Between Franklin Ave and Hollywood Blvd	Residential/Commercial	65.4
Bronson Ave	Between Hollywood Blvd and Sunset Blvd	Residential/Commercial	65.7
Bronson Ave	North of Franklin Ave	Residential/Commercial	62.9
Bronson Ave	South of Sunset Blvd	Residential/Commercial/ Educational	66.8
Cahuenga Blvd	North of US-101 NB off-ramp	Residential/Hotel	69.0
Cahuenga Blvd	Between US-101 NB off-ramp and US-101 SB off-ramp	Freeway Underpass	68.7

[30] The traffic noise model which was developed based on calculation methodologies provided in the Caltrans TeNS document and traffic data provided in the Project's TA provided in Appendix N-1 to this Draft EIR. This methodology, considered an industry standard, allows for the definition of roadway configurations, barrier information (if any), and receiver locations.

TABLE IV.I-6
MODELED EXISTING VEHICULAR TRAFFIC NOISE LEVELS

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA) Existing (A)
Cahuenga Blvd	Between US-101 SB off-ramp and US-101 SB on-ramp	Freeway Underpass	70.4
Cahuenga Blvd	Between US-101 SB on-ramp and Franklin Ave	Commercial	66.0
Cahuenga Blvd	Between Franklin Ave and Yucca St	Commercial/Motel	69.4
Cahuenga Blvd	Between Yucca St and Hollywood Blvd	Commercial	69.1
Cahuenga Blvd	Between Hollywood Blvd and Selma Ave	Commercial	68.3
Cahuenga Blvd	Between Selma Ave and Sunset Blvd	Commercial	68.4
Cahuenga Blvd	Between Sunset Blvd and De Longpre Ave	Commercial	67.8
Cahuenga Blvd	Between De Longpre Ave and Fountain Ave	Residential/Commercial	69.0
Cahuenga Blvd	Between Fountain Ave and Santa Monica Blvd	Residential/Commercial/ Educational	68.8
Cahuenga Blvd	Between Santa Monica Blvd and Willoughby Ave	Commercial/Educational	68.2
Cahuenga Blvd	Between Willoughby Ave and Melrose Ave	Commercial	67.2
Cahuenga Blvd	South of Melrose Ave	Residential	60.5
Camrose Dr/ Milner Rd	East of N Highland Ave	Residential	55.4
Camrose Dr/ Milner Rd	West of N Highland Ave	Residential	58.6
Carlos Ave	East of N Gower St	Residential/Religious	55.0
Carlos Ave	West of N Gower St	Residential	54.0
Cole Ave	Between Fountain Ave and Santa Monica Blvd	Commercial	59.0
Cole Ave	North of Fountain Ave	Commercial	57.9
Cole Ave	South of Santa Monica Blvd	Commercial	61.7

TABLE IV.I-6
MODELED EXISTING VEHICULAR TRAFFIC NOISE LEVELS

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA) Existing (A)
De Longpre Ave	Between Cahuenga Blvd and Vine St	Commercial	60.6
De Longpre Ave	east of Vine St	Commercial	59.6
De Longpre Ave	west of Cahuenga Blvd	Commercial	61.9
Fountain Ave	Between Cahuenga Blvd and Vine St	Commercial	67.2
Fountain Ave	Between Cole Ave and Cahuenga Blvd	Residential	65.1
Fountain Ave	Between Vine St and El Centro Ave	Residential/Commercial	66.9
Fountain Ave	East of El Centro Ave	Residential	66.7
Fountain Ave	West of Cole Ave	Residential/Commercial	66.7
Franklin Ave	Between Argyle Ave and N Gower St	Residential/Commercial	71.8
Franklin Ave	Between N Beachwood Dr and Bronson Ave	Commercial/Educational/Hotel/ Residential	72.2
Franklin Ave	Between N Cahuenga Blvd and Vine St	Residential/Commercial	64.5
Franklin Ave	Between N Gower St and N Beachwood Dr	Residential/Commercial	72.0
Franklin Ave	Between N Highland Ave and Wilcox Ave	Residential/Commercial	66.4
Franklin Ave	Between N La Brea Ave and Highland Ave	Residential/Educational/Open Space	70.4
Franklin Ave	Between Wilcox Ave and N Cahuenga Blvd	Commercial	67.0
Franklin Ave	East of Bronson Ave	Residential/Commercial	72.3
Franklin Ave	East of Highland Ave	Residential/Religious	51.1
Franklin Ave	West of N Highland Ave	Residential	39.6
Franklin Ave	West of N La Brea Ave	Residential	62.2
Gower St	North of Franklin Ave	Residential	60.2
Gower St	Between Franklin Ave and US-101 NB off-ramp	Commercial/Hotel	66.5

TABLE IV.I-6
MODELED EXISTING VEHICULAR TRAFFIC NOISE LEVELS

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA) Existing (A)
Gower St	Between US-101 NB off-ramp and US-101 SB off-ramp/Yucca St	Religious/Open Space	66.5
Gower St	Between US-101 SB off-ramp/Yucca St and Yucca St	Religious/Open Space	68.3
Gower St	Between Yucca St and Carlos Ave	Residential/Religious/ Educational	68.4
Gower St	Between Carlos Ave and Hollywood Blvd	Residential/Commercial	68.5
Gower St	Between Hollywood Blvd and Selma Ave	Residential/Commercial	68.1
Gower St	Between Selma Ave and Sunset Blvd	Residential/Commercial	67.6
Gower St	South of Sunset Blvd	Residential/Commercial	67.6
Hawthorne Ave	East of N La Brea Ave	Residential/Educational/Hotel	61.4
Hawthorne Ave	West of N La Brea Ave	Residential/Commercial	53.5
Highland Ave	North of Camrose Dr/Milner Rd	Residential/Open Space	73.2
Highland Ave	Between Camrose Dr/Milner Rd and Franklin Ave	Commercial/Hotel	72.9
Highland Ave	Between Franklin Ave and Franklin Ave	Commercial	73.1
Highland Ave	Between Franklin Ave and Hollywood Blvd	Residential/Commercial	70.5
Highland Ave	Between Hollywood Blvd and Selma Ave	Commercial/Educational	69.8
Highland Ave	Between Selma Ave and Sunset Blvd	Commercial/Educational	70.1
Highland Ave	South of Sunset Blvd	Residential/Commercial	70.0
Hollywood Blvd	Between Argyle Ave and Gower St	Residential/Commercial	69.4
Hollywood Blvd	Between Cahuenga Blvd and Ivar Ave	Commercial	68.7
Hollywood Blvd	Between Gower St and N Bronson Ave	Commercial/Hotel/Religious	69.5

TABLE IV.I-6
MODELED EXISTING VEHICULAR TRAFFIC NOISE LEVELS

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA) Existing (A)
Hollywood Blvd	Between Highland Ave and Wilcox Ave	Commercial	68.8
Hollywood Blvd	Between US-101 SB ramps and US-101 NB ramps/Van Ness Ave	Freeway Overpass	70.5
Hollywood Blvd	Between Ivar Ave and Vine St	Commercial/Hotel	68.9
Hollywood Blvd	Between N Bronson Ave and US-101 SB ramps	Commercial	69.6
Hollywood Blvd	Between N Fuller Ave and N La Brea Ave	Residential/Commercial/Religious	70.6
Hollywood Blvd	Between N La Brea Ave and Orange Dr	Commercial	68.3
Hollywood Blvd	Between Orange Dr and Highland Ave	Commercial/Hotel	68.2
Hollywood Blvd	Between Vine St and Argyle Ave	Commercial	69.2
Hollywood Blvd	Between Wilcox Ave and Cahuenga Blvd	Commercial/Medical	69.1
Hollywood Blvd	East of US-101 NB ramps/Van Ness Ave	Commercial	70.7
Hollywood Blvd	West of N Fuller Ave	Residential	72.2
Ivar Ave	Between Hollywood Blvd and Selma Ave	Residential/Commercial/Library	63.1
Ivar Ave	Between Selma Ave and Sunset Blvd	Commercial/Educational	64.0
Ivar Ave	Between Yucca St and Hollywood Blvd	Residential/Commercial	63.4
Ivar Ave	North of Yucca St	Residential	55.6
Ivar Ave	South of Sunset Blvd	Commercial	64.0
Lexington Ave	East of Vine St	Residential/Commercial	59.8
Lexington Ave	West of Vine St	Residential/Educational	60.8
Melrose Ave	Between Cahuenga Blvd and Vine St	Commercial	71.5
Melrose Ave	East of Vine St	Commercial/Senior Care	71.8
Melrose Ave	West of Cahuenga Blvd	Residential/Commercial	73.0

TABLE IV.I-6
MODELED EXISTING VEHICULAR TRAFFIC NOISE LEVELS

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA) Existing (A)
N Beachwood Dr	North of Franklin Ave	Residential/Educational	64.3
N Beachwood Dr	South of Franklin Ave	Commercial/Motel	56.5
Orange Dr	North of Hollywood Blvd	Residential	61.1
Orange Dr	South of Hollywood Blvd	Commercial/Hotel	60.1
Santa Monica Blvd	Between Cahuenga Blvd and Vine St	Commercial	70.8
Santa Monica Blvd	Between Cole Ave and Cahuenga Blvd	Commercial/Open Space	70.8
Santa Monica Blvd	Between Vine St and El Centro Ave	Commercial	70.8
Santa Monica Blvd	East of El Centro Ave	Commercial	70.9
Santa Monica Blvd	West of Cole Ave	Commercial	72.2
Selma Ave	Between Argyle Ave and N Gower St	Commercial/Hotel	62.8
Selma Ave	Between Ivar Ave and Vine St	Residential/Commercial	62.8
Selma Ave	Between N Cahuenga Blvd and Ivar Ave	Commercial	62.9
Selma Ave	Between N Highland Ave and N Cahuenga Blvd	Commercial/Educational/ Religious	61.5
Selma Ave	Between Vine St and Argyle Ave	Residential/Commercial	64.7
Selma Ave	East of N Gower St	Residential	51.6
Sunset Blvd	Between Argyle Ave and Gower St	Commercial	71.6
Sunset Blvd	Between Cahuenga Blvd and Ivar Ave	Commercial	71.1
Sunset Blvd	Between Gower St and Bronson Ave	Commercial/Hotel	71.6
Sunset Blvd	Between Ivar Ave and Vine St	Commercial/Educational	71.3
Sunset Blvd	Between N Highland Ave and Wilcox Ave	Commercial/Educational/ Religious	71.2

TABLE IV.I-6
MODELED EXISTING VEHICULAR TRAFFIC NOISE LEVELS

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA) Existing (A)
Sunset Blvd	Between Vine St and Argyle Ave	Commercial	71.8
Sunset Blvd	Between Wilcox Ave and Cahuenga Blvd	Commercial	71.4
Sunset Blvd	East of Bronson Ave	Residential/Commercial	72.0
Sunset Blvd	West of N Highland Ave	Commercial/Educational/Motel	72.8
US-101 NB off-ramp	Off-ramp east of N Cahuenga Blvd	Freeway Ramp	62.0
US-101 NB off-ramp	Off-ramp east of N Gower St	Freeway Ramp	61.0
US-101 NB ramps/Van Ness Ave	Ramps/Van Ness Ave north of Hollywood Blvd	Freeway Ramp	67.7
US-101 NB ramps/Van Ness Ave	Ramps/Van Ness Ave south of Hollywood Blvd	Freeway Ramp	63.7
US-101 SB off-ramp	Off-ramp Between Vine St/Franklin Ave and Argyle Ave	Freeway Ramp	72.3
US-101 SB off-ramp	Off-ramp west of N Cahuenga Blvd	Freeway Ramp	68.2
US-101 SB off-ramp/Yucca St	Off-ramp/Yucca St east of N Gower St	Freeway Ramp	55.1
US-101 SB off-ramp/Yucca St	Off-ramp/Yucca St west of N Gower St	Freeway Ramp	63.3
US-101 SB on-ramp	On-ramp east of Argyle Ave	Freeway Ramp	60.7
US-101 SB on-ramp	On-ramp east of N Cahuenga Blvd	Freeway Ramp	58.9
US-101 SB ramps	Ramps north of Hollywood Blvd	Freeway Ramp	65.1
US-101 SB ramps	Ramps south of Hollywood Blvd	Freeway Ramp	60.8
Vine St	Between Fountain Ave and Lexington Ave	Commercial	70.6
Vine St	Between Hollywood Blvd and Selma Ave	Residential/Commercial/Hotel	70.6

TABLE IV.I-6
MODELED EXISTING VEHICULAR TRAFFIC NOISE LEVELS

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA) Existing (A)
Vine St	Between Santa Monica Blvd and Willoughby Ave	Commercial/Educational	70.6
Vine St	Between Sunset Blvd and De Longpre Ave	Residential/Commercial	70.8
Vine St	Between De Longpre Ave and Fountain Ave	Commercial	70.8
Vine St	Between Lexington Ave and Santa Monica Blvd	Commercial/Hotel	70.7
Vine St	Between Selma Ave and Sunset Blvd	Residential/Commercial	70.5
Vine St	Between Willoughby Ave and Melrose Ave	Commercial/Motel	70.5
Vine St	Between Yucca St and Hollywood Blvd	Commercial/Educational	70.3
Vine St	South of Melrose Ave	Residential/Religious	70.2
Vine St/Dix St	East of Argyle Ave	Freeway Underpass	56.6
Vine St/Dix St	West of Argyle Ave	Commercial/Hotel	57.4
Vine St/Franklin Ave	Between US-101 SB off-ramp and Yucca St	Commercial/Hotel	64.7
Wilcox Ave	Between Franklin Ave and Yucca St	Residential/Commercial	65.0
Wilcox Ave	Between Hollywood Blvd and Sunset Blvd	Commercial	65.9
Wilcox Ave	Between Yucca St and Hollywood Blvd	Residential/Commercial	65.8
Wilcox Ave	North of Franklin Ave	Residential/Commercial	63.4
Wilcox Ave	South of Sunset Blvd	Commercial	65.6
Willoughby Ave	Between Cahuenga Blvd and Vine St	Commercial/Educational	64.6
Willoughby Ave	East of Vine St	Residential	61.9
Willoughby Ave	West of Cahuenga Blvd	Commercial	66.2
Yucca St	Between Argyle Ave and N Gower St	Residential/Religious	61.4
Yucca St	Between Ivar Ave and Vine St	Commercial/Educational	64.5

TABLE IV.I-6
MODELED EXISTING VEHICULAR TRAFFIC NOISE LEVELS

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA) Existing (A)
Yucca St	Between N Cahuenga Blvd and Ivar Ave	Residential/Commercial	62.8
Yucca St	Between Vine St and Argyle Ave	Residential/Commercial	64.0
Yucca St	Between Wilcox Ave and N Cahuenga Blvd	Residential/Commercial	59.1
Yucca St	West of Wilcox Ave	Residential	57.9

SOURCE: ESA, 2020.

As shown in Table IV.I-6, the ambient noise environment in the Project vicinity can be characterized by 24-hour CNEL levels attributable to existing traffic on local roadways. The calculated CNEL from actual existing traffic volumes on the analyzed roadway segments ranged from 39.6 dBA to 73.2 dBA for residential, religious, educational, and commercial areas.

(5) Existing Groundborne Vibration Levels

Aside from periodic construction work occurring throughout the City, field observations noted that other sources of groundborne vibration in the Project Site vicinity are primarily limited to heavy-duty vehicular travel (refuse trucks, delivery trucks, etc.) on local roadways. Trucks traveling at a distance of 50 feet typically generate groundborne vibration velocity levels of 65 VdB (approximately 0.0068 in/sec PPV).[31]

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to noise if it would result in:

Threshold (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;

[31] FTA, *Transit Noise and Vibration Impact Assessment Manual*, 2018, Figure 5-4.

Threshold (b): Generation of excessive groundborne vibration or groundborne noise levels; or

Threshold (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.

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide and the FTA's groundborne vibration and noise criteria for assessing potential impacts relating to building damage and human annoyance will, as appropriate, to assist in answering the Appendix G Threshold questions. The factors to evaluate noise impacts are listed below.

(1) Construction

The 2006 L.A. CEQA Thresholds Guide identifies the following criteria to evaluate construction noise:

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA L_{eq} or more at a noise sensitive use;
- Construction activities lasting more than 10 days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA L_{eq} or more at a noise sensitive use; or
- Construction activities would exceed the ambient noise level by 5 dBA L_{eq} at a noise sensitive use between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, before 8:00 A.M. or after 6:00 P.M. on Saturday, or at any time on Sunday.

As discussed in Chapter II, *Project Description*, of this Draft EIR, construction of the Project is anticipated to commence as early as 2021 at the West Site and be completed as early as 2025 (assuming overlap between West Site and East Site construction). Therefore, since construction activities would occur over a period longer than 10 days for all phases, the corresponding criteria used in the construction noise analysis presented in this section of the Draft EIR is an increase in the ambient exterior noise levels of 5 dBA L_{eq} or more at a noise sensitive use.

(2) Operations

The following criteria are applied to the Project, as set forth in the 2006 L.A. CEQA Thresholds Guide and the City's Noise Regulations, with the more restrictive provisions applied, to evaluate operational noise. The Project would have a significant impact from operations if:

- The Project causes the ambient noise levels measured at the property line of affected uses to increase by 3 dBA CNEL to or within the "normally unacceptable" or "clearly unacceptable" categories; or

- The Project causes the ambient noise levels measured at the property line of affected uses to increase by 5 dBA CNEL or more increase in noise level; or
- Project-related operational on-site (i.e., non-roadway) noise sources such as outdoor building mechanical/electrical equipment, outdoor activities, or parking facilities increase the ambient noise level (L_{eq}) at noise sensitive uses by 5 dBA L_{eq}.

In summary, for operational noise, the criterion for on-site operational noise is an increase in the ambient noise level of 5 dBA L_{eq} at an adjacent property line, in accordance with the LAMC.[32] The LAMC does not apply to off-site traffic (i.e., vehicle traveling on public roadways) noise levels. Therefore, the criteria for off-site traffic noise associated with Project operations is based on the 2006 L.A. CEQA Thresholds Guide. In addition, the criteria for composite noise levels (on-site and off-site sources) are also based on the 2006 L.A. CEQA Thresholds Guide as, again, the LAMC does not apply to off-site traffic noise. Therefore, the criteria used for determining impacts related to off-site operational noises and composite operational noise are an increase in the ambient noise level of 5 dBA CNEL or 3 dBA CNEL to or within the "normally unacceptable" or "clearly unacceptable" categories, respectively, depending on the existing noise conditions at the affected noise-sensitive land use.

(3) Groundborne Vibration

The City has not adopted criteria to assess vibration impacts during construction. Thus, for this Project, the City has determined to use the FTA's criteria for structural damage and human annoyance, as described in Tables IV.I-1 and IV.I-2, respectively, to evaluate potential impacts related to Project construction and operation.

- Potential Building Damage – Project construction activities that cause groundborne vibration levels to exceed the potential structural damage threshold of 0.5-in/sec PPV at the nearest off-site buildings or structures of Building Category I, Reinforced-concrete, steel, or timber (no plaster).
- Potential Building Damage – Project construction activities that cause groundborne vibration levels to exceed the potential structural damage threshold of 0.3-in/sec PPV at the nearest off-site buildings of Building Category II, Engineered concrete and masonry (no plaster).
- Potential Building Damage – Project construction activities that cause groundborne vibration levels to exceed the potential structural damage threshold of 0.2-in/sec PPV at the nearest off-site buildings of Building Category III, Non-engineered timber and masonry buildings.

[32] Since the noise levels are measured at exterior locations at property lines, the noise levels inside buildings would be less than the values used for determining impacts. With windows closed, the minimum exterior-to-interior noise attenuation for typical structures in California is approximately 25 to 30 dBA or potentially more with improved noise abatement materials or techniques. See: Gordon, C.G., W.J. Galloway, B.A. Kugler, and D.L. Nelson. NCHRP Report 117: Highway Noise: A Design Guide for Highway Engineers. Washington, D.C.: Transportation Research Board, National Research Council, 1971.

- Potential Building Damage – Project construction activities that cause groundborne vibration levels to exceed the potential structural damage threshold of 0.12-in/sec PPV at the nearest off-site buildings of Building Category IV, Buildings extremely susceptible to building damage.

Based on FTA guidelines, construction and operational vibration impacts associated with human annoyance would be significant if the following were to occur (applicable to frequent events; 70 or more vibration events per day):

- Project construction and operational activities cause groundborne vibration levels to exceed 72 VdB at off-site sensitive uses, including residential and theater uses.
- Project construction and operational activities cause groundborne vibration levels to exceed 75 VdB at off-site institutional uses.

b) Methodology

The Project's noise and vibration impacts associated with on-site construction equipment were evaluated in the Construction Noise & Vibration Impact Study, prepared by AES, provided in Appendix K-1 of this Draft EIR. The methodology used in that assessment is incorporated herein. The methodology for evaluating off-site construction noise and vibration and on-site and off-site operational noise and vibration is also discussed below and the calculation assumptions and results are also provided in Appendix K-2 of this Draft EIR.

(1) On-Site Construction Noise

Construction noise impacts due to on-site construction activities associated with the Project were evaluated by calculating the construction-related noise levels at representative sensitive receptor locations and comparing these estimated construction-related noise levels associated with construction of the Project to the existing ambient noise levels (i.e., noise levels without construction noise from the Project). On-site construction noise associated with the Project was analyzed based on the Project's potential construction equipment inventory, construction durations, and construction schedule. This information is provided in the Construction Noise & Vibration Impact Study, prepared by AES, which is included in Appendix K-1 of this Draft EIR. The construction equipment noise levels are based on the published noise data (equipment source levels) by FHWA's Roadway Construction Noise Model (RCNM).[33] The construction noise levels were then calculated for sensitive receptor locations based on the standard point source (e.g., generator or bulldozer) noise-distance attenuation factor of 6 dBA for each doubling of distance. Additional noise attenuation was assigned to receptor locations where the line-of-sight to the Project Site was interrupted by the presence of intervening structures. For the noise analysis, a 5 dBA noise attenuation (i.e., reduction) was assigned for receptor locations where the acoustic line-of-sight would be just interrupted (i.e., around the edge of a building) and a 10 dBA noise attenuation for receptor locations where the acoustic line-of-sight would be fully interrupted (i.e., by intervening buildings).

[33] Federal Highway Administration (FHWA), Roadway Construction Noise Model, 2006.

The analysis below evaluates noise and vibration impacts under both the sequential construction scenario and the overlapping construction scenario. Under the sequential construction scenario, construction activities on the West Site and East Site would occur sequentially with no overlapping construction activities between the two sites, but does account for overlapping construction phases within each site (e.g., demolition phase may overlap with the site preparation and/or grading phase, etc.); and would be completed over an approximately seven-year period (beginning in 2021 with completion in 2027). Under the overlapping construction scenario, the utilities/trenching, site preparation, and grading/ excavation phases could begin on the East Site, while the West Site is in the building construction phase. In this overlapping construction scenario, construction could be completed in approximately 4.5 years (beginning in 2021 with completion in 2025).

Although the East Senior Building would be two floors shorter under the Project with the East Site Hotel Option, construction would require the same construction equipment as the Project. Construction duration for the Project with the East Site Hotel Option would slightly decrease due to construction of a shorter building. However, the amount of maximum daily construction equipment, which is the primary basis for the analysis, under the East Site Hotel Option, would be the same as the Project. Therefore, the Project's analysis of construction noise and vibration impacts encompasses the maximum anticipated daily noise and vibration levels that would occur during construction and applies to both the Project and the Project with the East Site Hotel Option.

(2) Off-Site Roadway Noise (Construction and Operation)

Roadway noise impacts were evaluated using the FHWA TNM based on the roadway traffic volume data provided in the TA prepared for the Project and included in Appendix N-1 of this Draft EIR.[34] This method allows for the definition of roadway configurations, barrier information (if any), and receiver locations. Roadway noise attributable to Project development was calculated and compared to baseline noise levels that would occur under the "Without Project" condition.

Although the East Senior Building under the Project with the East Site Hotel Option would be two floors shorter than under the Project, construction would require the same construction trucks and vehicles as the Project, and roadway noise impacts would be the same during peak construction days.

With respect to operational traffic noise, impacts are evaluated for the buildout year 2027 under the sequential construction scenario, which provides for a more conservative analysis compared to buildout year 2025 under the overlapping construction scenario since total roadway traffic volumes are generally assumed to increase in future years. Operational traffic noise is also evaluated for year 2040, which would be the worst-case scenario for the analysis of noise impacts only.

[34] Fehr & Peers, Transportation Assessment for the Hollywood Center Project, March 2020. Provided in Appendix N-1 of this Draft EIR.

(3) Stationary Point-Source Noise (Operations)

Stationary noise impacts were evaluated by identifying the noise levels generated by outdoor stationary noise sources, such as open spaces, outdoor activities, rooftop mechanical equipment, and loading area activity, calculating the hourly L_{eq} noise level from each noise source at sensitive receptor property lines, and comparing such noise levels to existing ambient noise levels.

On-site operational noise was modeled using CadnaA noise propagation program. CadnaA is a Windows-based software program that predicts and assesses noise levels in the vicinity of noise sources based on International Organization for Standardization 9613-2 algorithms for noise propagation calculations. CadnaA considers environmental factors, such as topography, intervening structures, and distance (both horizontally and vertically) from a noise source. This is particularly relevant for projects containing outdoor meeting, performance, and gathering areas at varying elevations that would have amplified sound and could potentially affect surrounding land uses and receptors. Since the Project has various open air areas (e.g. decks, rooftops, plazas) that create a relatively complex soundscape, the CadnaA model was used to estimate the various noise sources and their effects on the ambient noise environment.

For purposes of providing a conservative noise analysis for outdoor spaces, the maximum occupant load of Project outdoor spaces was calculated based on an occupancy load factor of 15 square feet per person for an assembly area without fixed seats, according to the California Building Code Table 1004.5 Maximum Floor Area Allowances Per Occupant.[35] Although this occupancy load factor provides an overestimation of the occupancy load and associated noise within passive landscaped areas, it has been applied to the square footage of the Project's outdoor spaces to provide a conservative worst-case noise analysis.

Actual capacities for the Project outdoor spaces would be lower and, in some cases substantially lower, due to design considerations, such as building ingress/egress limitations, elevator and stairwell capacities, fire escape route capacities, and other capacity considerations. Noise from female adults, male adults, and children talking at a raised level is approximately 63 dBA, 65 dBA, and 65 dBA, respectively, at a distance of 3 feet.[36] As a conservative analysis, it is assumed that each outdoor space would be at full capacity and that half of the visitors would be adults (half male and half female) and half would be children. Of the adults and children, half would be talking simultaneously (assuming approximately half of the occupants talking and the other half listening).

Operational noise, based on the above methodology and assumptions, would result in potentially significant impacts if noise levels exceed the significance threshold identified above in the *Thresholds of Significance* subsection.

[35] California Building Standards Commission, 2019 Title 24, Part 2, Volume 1 – California Building Code.
[36] *American Journal of Audiology* Vol.7 21-25 October 1998. doi:10.1044/1059-0889(1998/012).

(4) Groundborne Vibration (Construction and Operation)

Groundborne vibration impacts due to the Project's construction activities were evaluated by identifying potential vibration sources (i.e., construction equipment), estimating the vibration levels at the potentially affected receptor, and comparing the Project's activities to the applicable vibration significance thresholds. Vibration levels were calculated based on the FTA published standard vibration velocities for various construction equipment operations.[37] The vibration velocities were calculated based on a point source with standard distance propagation conditions, pursuant to FTA procedures. Construction of the Project would not use impact pile driving methods, and as such, impact pile driving vibration is not included in this construction vibration analysis. However, this analysis includes use of augured or drilled piles, as proposed for use by the Project, which are less vibration-intensive than impact pile driving.

The Capitol Records Building and Gogerty Building are constructed of reinforced concrete which does not contain plaster that is extremely susceptible to building damage; therefore, the Capitol Records Building and Gogerty Building are evaluated based on the significance threshold for FTA Building Category I for potential structural damage. For similar reasons, the AMDA Vine Building, the AMDA Tower Building, the Argyle House at the southwest corner of Yucca Street/Argyle Avenue, and the Eastown residential building are also evaluated based on the significance threshold for FTA Building Category I for potential structural damage. The single-story commercial buildings on the west side of Ivar Avenue (at 6340 Yucca Street, 1763 Ivar Avenue and the Hollywood-Ivar Building at 1741 Ivar Avenue), the single-story commercial building (at 1718 N. Vine Street) adjacent to the south of the East Site, and the h Club LA building are concrete and masonry with no plaster that would render it extremely susceptible to building damage, and are evaluated based on the significance threshold for FTA Building Category III for potential structural damage. Vibration receptor buildings that are considered historic structures, as listed in Table IV-I-4, are evaluated based on the significance threshold for FTA Building Category IV for potential structural damage.

c) Project Design Features

Refer to Project Design Feature TRAF-PDF-1 (Transportation Demand Management Program) in Section IV.L, *Transportation,* of this Draft EIR. With this Project Design Feature, the Project will implement a Transportation Demand Management (TDM) Program aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking. The TDM Program will minimize Project trips and its contribution to traffic noise levels. The TDM Program will be subject to review and approval by the Los Angeles Department of City Planning and LADOT. In addition, the following Project Design Features related to noise will be implemented as part of the Project:

[37] FTA, *Transit Noise and Vibration Impact Assessment Manual*, 2018, Table 7-4.

- **NOI-PDF-1: Impact Pile Driving and Blasting Prohibitions.** The Project will not use or allow impact pile drivers and will not require or allow blasting during construction activities.
- **NOI-PDF-2: Construction Power Sources.** Electricity from power poles, where power poles are available, and/or solar-powered generators rather than temporary diesel or gasoline generators will be used during construction. If diesel- or gasoline-powered generators are used, such equipment will be located at least 100 feet away from off-site sensitive land uses (e.g., residences, schools, childcare centers, hospitals, parks, or similar uses), whenever possible, and flexible sound control curtains will be placed around the equipment when in use.
- **NOI-PDF-3: Outdoor Performance Sound Restrictions.** The Project will not require or allow operation of an amplified sound system in the outdoor plaza areas for performances, including the East Site Level 1 Performance Stage. Acoustic performances or ambient music speakers with prerecorded, low-level, background music on the East Site Level 1 Performance Stage will be limited to a sound level equivalent to 85 dBA measured at 25 feet from the performers. Compliance with this performance standard will be ensured through pre-performance noise tests/measurements for performances or ambient music speakers with potential to exceed the sound level, along with any necessary adjustments to the location and nature of proposed performances or ambient music speakers. Ambient music speakers for use on the Amenity Decks (Level 2) on both the East Site and the West Site will be downward or inward facing and used for background music only.
- **NOI-PDF-4: Emergency Generators.** Emergency generators will be designed to meet the requirements of LAMC Chapter XI, Section 112.02. Section 112.02 of the LAMC requires that any mechanical system within any zone of the City not cause an increase in ambient noise levels on any other occupied property or if a condominium, apartment house, duplex, or attached business, within any adjoining unit to exceed the ambient noise level by more than 5 dBA.

d) Analysis of Project Impacts

Threshold (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?

Although the East Senior Building under the Project with the East Site Hotel Option would be two floors shorter than the Project, it would require the same construction equipment as the Project. Construction duration for the Project with the East Site Hotel Option would slightly decrease due to construction of a shorter building. However, the amount of maximum daily construction equipment, which is the basis for the analysis, would be the same for the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the impact analysis, impact significance and mitigation measures presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

During operations, the Project and the Project with the East Site Hotel Option would generate different operational traffic volumes. Therefore, roadway noise impacts were evaluated for both the Project and the Project with the East Site Hotel Option. However, conclusions regarding the operational traffic noise mitigation measures and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

Also, operational noise sources would be essentially the same under the Project and the Project with the East Site Hotel Option. Accordingly, Project-related stationary source noise impacts would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the stationary source impact analysis, mitigation measures, and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

(1) Impact Analysis

(a) Construction Impacts

(i) On-Site Construction Noise

Project construction activities would be required to comply with the City's Ordinance Nos. 144,331 and 161,574, which prohibit the emission or creation of noise beyond 75 dBA at 50 feet from the equipment, unless technically infeasible.[38] In addition, the Project would be subject to Section 91.106.4.8 (Construction Site Notice, City's Ordinance 178,048), which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported.

Noise impacts from Project construction activities would be a function of the noise generated by construction equipment, the location of the equipment, the timing and duration of the noise-generating construction activities, and the relative distance to noise-sensitive receptors. Construction activities for the Project would generally include demolition, site grading and excavation for the subterranean parking garage, and building construction. Each phase of construction would involve the use of various types of construction equipment and would, therefore, have its own distinct noise characteristics. A list of the construction equipment that would be used during each phase of construction is provided in the Construction Noise & Vibration Impact Study, prepared by AES, which is included in Appendix K-1 of this Draft EIR. Noise from construction equipment would generate both steady-state and episodic noise that could be heard within and adjacent to the Project Site.

Construction noise levels fluctuate throughout a given workday as construction equipment move from one location to another within a project site. When construction equipment would

[38] As provided in LAMC Section 112.05, technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of the equipment.

be in use further away from a sensitive receptor location, construction noise levels would be lower than the calculated values provided herein, which assumes construction equipment would be in use nearest to a sensitive receptor location. Exposure to fluctuating construction noise levels that would at times be lower than the noise levels shown in the analysis below would not rise to the level that would result in hearing loss[39] or adverse health impacts.

Individual pieces of construction equipment that would be used for construction of the Project produce maximum noise levels of 74 dBA to 90 dBA at a reference distance of 50 feet from the noise source, as shown in **Table IV.I-7**, *Construction Equipment Noise Reference Levels and Usage Factors*. The construction equipment noise levels at 50 feet distance (Referenced Maximum Noise Levels) are based on the FHWA RCNM User's Guide,[40] which is a technical report containing actual measured noise data for construction equipment. These maximum noise levels would occur when equipment is operating under full power conditions (i.e., the equipment engine at maximum speed). However, equipment used on construction sites often operates under less than full power conditions or part power. To more accurately characterize construction-period noise levels, the average (hourly L_{eq}) noise level associated with each construction phase is calculated based on the quantity, type, and usage factors for each type of equipment that would be used during each construction phase.[41] These noise levels are typically associated with multiple pieces of equipment operating simultaneously.

Table IV.I-8, *Construction Noise Levels – West Site (Sequential Construction Scenario)* and **Table IV.I-9**, *Construction Noise Levels – East Site (Sequential Construction Scenario)*, provide the estimated construction noise levels under the sequential construction scenario at the off-site noise-sensitive receptors for construction activities at the West Site and East Site, respectively. To present a conservative impact analysis, the estimated noise levels were calculated with all pieces of construction equipment assumed to operate simultaneously and located at construction areas nearest to the affected receptors. In addition, the analysis accounts for overlapping construction phases that would occur on each of the individual sites (i.e., the West Site and the East Site) to provide maximum construction noise levels from on-site construction activities on each site. **The estimated West Site construction noise levels would exceed the significance threshold at receptors 1, 3, and 6 through 13. The estimated East Site construction noise levels under both the Project and the Project with the East Site Hotel Option would exceed the significance threshold at receptors 1, 3, and 5 through 13. Therefore, the noise impacts at both the West Site and East Site would be potentially significant. See the *Mitigation Measures* subsection below for feasible mitigation that would lessen but not reduce impacts to a less-than-significant level.**

[39] United States Department of Labor, Occupational Safety and Health Administration, Occupational Safety and Health Standards Part 1910, Standard 1910.95.

[40] FHWA, Roadway Construction Noise Model, 2006.

[41] Pursuant to the FHWA *Roadway Construction Noise Model User's Guide*, 2005, the usage factor is the percentage of time during a construction noise operation that a piece of construction is operating at full power.

TABLE IV.I-7
CONSTRUCTION EQUIPMENT NOISE REFERENCE LEVELS AND USAGE FACTORS

Type of Equipment	Acoustical Usage Factor[a] (%)	Reference Maximum Noise Levels at 50 Feet,[a,b] L_{max} (dBA)
Air Compressor	40	78
Cement and Mortar Mixer	50	80
Compactor	20	83
Concrete Mixer Truck	40	79
Concrete Saw	20	90
Crane	16	81
Drill Rig	20	84
Forklift	20	75
Generator	50	81
Dump/Haul Truck	40	76
Jackhammer	20	89
Excavator	40	81
Pump	50	81
Roller	20	80
Rubber Tired Loader	40	79
Tractor/Loader/Backhoe	40	80
Pavement Scarifier	20	90
Delivery Truck	40	74
Welders	40	74

[a] The usage factor is the percentage of time during a construction noise operation that a piece of construction is operating at full power.

[b] Construction equipment noise levels are based on the FHWA RCNM.

SOURCE: FHWA, Roadway Construction Noise Model User's Guide, 2006, Table 1.

In addition, **Table IV.I-10**, *Construction Noise Levels – Overlapping Construction Scenario*, provides the estimated noise levels due to overlapping construction activities between the West Site and East Site. **As indicated in Table IV.I-10, the estimated noise levels due to overlapping construction activities between the West Site and East Site under both the Project and the Project with the East Site Option would exceed the significance threshold at receptors 1, 3, and 5 through 13, and, therefore, construction noise impacts under the overlapping construction scenario would be potentially significant. See the *Mitigation Measures* subsection below, for feasible mitigation that would lessen but not reduce impacts to a less-than-significant level.**

TABLE IV.I-8
CONSTRUCTION NOISE LEVELS – WEST SITE (SEQUENTIAL CONSTRUCTION SCENARIO)

		Estimated Noise Levels by Construction Phase, dBA (L_{eq})							
Location	Distance to Const. Site, feet	Demolition/ Drainage/ Utilities/ Trenching	Demolition/ Site Preparation/ Grading	Foundations/ Concrete Pour	Building Construction	Building Construction/ Architectural Coating	Building Construction/ Architectural Coating/ Paving	Significance Threshold,[a] dBA (L_{eq})	Potentially Significant Impact?
1	170	**78.9**	**79.4**	**74.8**	**75.2**	**75.7**	**79.4**	64.9	**Yes**
2	360	72.6	73.4	68.6	68.9	69.4	73.1	78.0	No
3	300	**74.2**	**74.9**	70.1	70.5	71.0	**74.7**	73.3	**Yes**
4[b]	550	64.1	64.9	59.9	60.4	60.9	64.5	73.3	No
5[b]	530	59.4	60.2	55.3	55.7	56.2	59.9	73.3	No
6	10	**100.5**	**100.0**	**96.4**	**96.5**	**97.1**	**100.5**	69.9	**Yes**
7	100	**81.4**	**81.8**	**77.4**	**77.7**	**78.2**	**82.0**	69.9	**Yes**
8	530	**69.4**	**70.2**	**65.3**	**65.7**	**66.2**	**69.9**	65.1	**Yes**
9	280	**74.8**	**75.4**	**70.7**	**71**	**71.5**	**75.3**	65.1	**Yes**
10	280	**74.8**	**75.4**	70.7	71	71.5	**75.3**	73.1	**Yes**
11[b]	100	**73.3**	**73.6**	69.2	69.5	70.0	**73.8**	73.1	**Yes**
12	90	**84.1**	**84.4**	**80.1**	**80.3**	**80.8**	**84.6**	68.2	**Yes**
13[b]	140	**75.5**	**75.9**	**71.5**	**71.8**	**72.3**	**76.0**	67.7	**Yes**

[a] Significance thresholds are equivalent to the measured daytime ambient noise levels plus 5 dBA.

[b] Receptor locations with acoustic line-of-sight to the Project construction site blocked.

Bold-faced represents noise levels exceeded the significance threshold.

SOURCE: AES, Construction Noise & Vibration Impact Study, March 2020. Provided in Appendix K-1 of this Draft EIR.

TABLE IV.I-9
CONSTRUCTION NOISE LEVELS – EAST SITE (SEQUENTIAL CONSTRUCTION SCENARIO)

		Estimated Noise Levels by Construction Phase, dBA (L_{eq})						
Location	**Distance to Const. Site, feet**	**Site Preparation/ Utilities/ Trenching/ Grading**	**Concrete Pour**	**Building Construction**	**Building Construction/ Architectural Coating**	**Building Construction/ Architectural Coating/Paving**	**Significance Threshold,[a] dBA (L_{eq})**	**Potentially Significant Impact?**
1	350	**67.4**	63.8	64.2	64.7	**68.4**	64.9	**Yes**
2	280	69.3	65.7	66	66.5	70.3	78.0	No
3	10	**99.8**	**96.4**	**96.5**	**97.1**	**100.5**	73.3	**Yes**
4[b]	230	70.8	67.3	67.7	68.2	71.9	73.3	No
5[b]	80	**84.4**	**81.1**	**81.3**	**81.8**	**85.6**	73.3	**Yes**
6	220	**76.2**	**72.7**	**73**	**73.5**	**77.3**	69.9	**Yes**
7	400	**73.8**	**70.2**	**70.6**	**71.1**	**74.8**	69.9	**Yes**
8	80	**84.4**	**81.1**	**81.3**	**81.8**	**85.6**	65.1	**Yes**
9	10	**99.8**	**96.4**	**96.5**	**97.1**	**100.5**	65.1	**Yes**
10	100	**82.6**	**79.2**	**79.5**	**80.0**	**83.8**	73.1	**Yes**
11[b]	90	**83.4**	**80.1**	**80.3**	**80.8**	**84.6**	73.1	**Yes**
12	300	**73.7**	**70.1**	**70.5**	**71.0**	**74.7**	68.2	**Yes**
13[b]	650	67.3	63.5	63.9	64.4	**68.1**	67.7	**Yes**

[a] Significance thresholds are equivalent to the measured daytime ambient noise levels plus 5 dBA.

[b] Receptor locations with acoustic line-of-sight to the Project construction site blocked.

Bold-faced represents noise levels exceeded the significance threshold.

SOURCE: AES, Construction Noise & Vibration Impact Study, March 2020. Provided in Appendix K-1 of this Draft EIR.

TABLE IV.I-10
CONSTRUCTION NOISE LEVELS – OVERLAPPING CONSTRUCTION SCENARIO

	Estimated Noise Levels by Overlapping Construction, dBA (L_{eq})										
Location	West Site Demo and Drainage/ Utilities/ Trenching	West Site Demo, Site Prep., and Grading	West Site Building Const., East Site Site Prep., Drainage/ Utilities/ Trench, & Grading	West Site Building Const. and Arch. Coating, and East Site Grading	West Site Building Const. and Arch. Coating, and East Site Foundation	West Site Building Const. and Arch. Coating, and East Site Building Const.	West Site Building Const., Arch. Coating, Paving, and East Site Building Const.	West Site Building Const. and Arch. Coating, and East Site Building Const. and Arch. Coating	East Site Building Const., Arch. Coating, and Paving	Significance Threshold,[a] dBA (L_{eq})	Potentially Significant Impact?
1[b]	**78.9**	**79.4**	**75.9**	**76.0**	**75.9**	**76.0**	**79.5**	**76.0**	**68.4**	64.9	**Yes**
2[b]	72.6	73.4	72.1	71.1	70.9	71.0	73.9	71.2	70.3	78.0	No
3	**74.2**	**74.9**	**99.8**	**94.6**	**96.4**	**96.5**	**96.5**	**97.1**	**100.5**	73.3	**Yes**
4[b]	64.1	64.9	71.2	68.5	68.2	68.5	69.4	68.9	71.9	73.3	No
5[b]	59.4	60.2	**84.4**	**80.5**	**81.1**	**81.3**	**81.3**	**81.8**	**85.6**	73.3	**Yes**
6	**100.5**	**100.0**	**96.5**	**97.1**	**97.1**	**97.1**	**100.5**	**97.1**	**77.3**	69.9	**Yes**
7	**81.4**	**81.8**	**79.2**	**78.9**	**78.8**	**78.9**	**82.3**	**79.0**	**74.8**	69.9	**Yes**
8	**69.4**	**70.2**	**84.4**	**80.7**	**81.2**	**81.4**	**81.6**	**81.9**	**85.6**	65.1	**Yes**
9	**74.8**	**75.4**	**99.8**	**94.6**	**96.4**	**96.5**	**96.5**	**97.1**	**100.5**	65.1	**Yes**
10	**74.8**	**75.4**	**82.9**	**79.6**	**79.9**	**80.1**	**80.9**	**80.6**	**83.8**	73.1	**Yes**
11[b]	**73.3**	**73.6**	**83.6**	**80.1**	**80.5**	**80.7**	**81.2**	**81.2**	**84.6**	73.1	**Yes**
12	**84.1**	**84.4**	**81.2**	**81.2**	**81.2**	**81.2**	**84.8**	**81.2**	**74.7**	68.2	**Yes**
13[b]	**75.5**	**75.9**	**73.1**	**73.0**	**72.8**	**72.9**	**76.3**	**72.9**	**68.1**	67.7	**Yes**

[a] Significance thresholds are equivalent to the measured daytime ambient noise levels plus 5 dBA.

[b] Receptor locations with acoustic line-of-sight to the Project construction site blocked.

Bold-faced represents noise levels exceeded the significance threshold.

SOURCE: AES, Construction Noise & Vibration Impact Study, March 2020. Provided in Appendix K-1 of this Draft EIR.

(ii) Off-Site Construction Noise

Construction truck trips would occur throughout the construction period and would be associated with hauling material and excavated soil from the Project Site and delivering building materials, supplies, and concrete to the Project Site. For purposes of this off-site construction noise analysis, the concrete pour stage was analyzed, which represents the worst-case day with the most construction traffic, an estimated maximum of approximately 172 worker's peak hour vehicle trips and approximately 21 haul truck peak hour trips would occur. The analysis assumes the overlapping of the building construction phase at the West Site and the utilities/trenching, site preparation, and grading/excavation phases at the East Site.

As discussed in the TA (see Appendix N-1 of this Draft EIR), Project haul trucks (e.g., trucks hauling dirt) would be required to use City-approved haul truck routes. For haul trucks, two approved haul routes are available from the Project Site, depending on which landfill is being used to deposit materials and which site the haul trucks are servicing.

Haul Route Option 1 would represent 70 percent of truck traffic with Option 2 covering the remaining 30 percent of trips. Haul Route Option 1 from the West Site follows northbound Ivar Avenue to eastbound Yucca Street to northbound Argyle Avenue, and then takes the US-101 ramp. Haul Route Option 1 from the East Site starts from northbound Vine Street to eastbound Yucca Street and then follows the same directions as the West Site.

Haul Route Option 2 from the West Site follows Ivar Avenue, to the US-101 ramp via eastbound Hollywood Boulevard. Haul Route Option 2 from the East Site follows southbound Vine Street to eastbound Hollywood Boulevard, and then takes the US-101 ramp.

Concrete trucks and worker vehicles would not be subject to the City-approved haul route. Because concrete trucks and worker vehicles would come from a variety of locations and it would be speculative to assume which roadways would be traveled by concrete trucks and worker vehicles, noise associated with all peak hour worker and concrete truck trips have been assumed for all the segments that are considered for the construction traffic analysis described above. This analysis represents worst-case construction traffic conditions and the studied segments encompass the route haul trucks would be subject to.

As shown in **Table IV.I-11**, *Estimate of Off-Site Construction Traffic Noise Levels*, the Project's construction trips by themselves would generate traffic noise levels of 5.4 dBA L_{eq} greater than existing traffic noise levels along Yucca Street between Argyle Avenue and N. Gower Street. Sensitive land uses along this segment include residential, hotel, and religious uses, such as residential uses on the north and south sides of Yucca Street, Kimpton Everly Hotel, Hollywood Hills Suites, and Saint Stephens Episcopal Church. Project-related construction traffic would result in significant noise levels (greater than 5 dBA L_{eq} compared to existing traffic noise levels) along this roadway segment (i.e.,

Yucca Street between Argyle Avenue and N. Gower Street), as shown in Table IV.I-11. **Therefore, off-site construction traffic noise impacts would be potentially significant for the Project and the Project with the East Site Hotel Option. See the Mitigation Measures subsection below for feasible mitigation that may lessen but not reduce impacts to a less-than-significant level.**

TABLE IV-I.11
ESTIMATE OF OFF-SITE CONSTRUCTION TRAFFIC NOISE LEVELS

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	dBA L_{eq}			Exceed Threshold?
			Existing (A)	Existing + Project Construction (B)	Project Difference (B–A)	
Option 1						
US-101 NB off-ramp	Off-ramp east of Gower St	Freeway Ramp	60.7	64.5	3.8	No
US-101 SB off-ramp	Off-ramp Between Vine St/Franklin Ave and Argyle Ave	Freeway Ramp	72	72.6	0.6	No
US-101 SB on-ramp	On-ramp east of Argyle Ave	Freeway Ramp	60.4	63.9	3.5	No
Argyle Ave	Between US-101 SB on-ramp and Yucca St	Residential/ Commercial	65.5	68.3	2.8	No
Vine St/ Dix St	West of Argyle Ave	Commercial/ Hotel	57.1	60.3	3.2	No
Gower St	Between US-101 SB off-ramp/Yucca St and Yucca St	Religious/Open Space	68	68.7	0.7	No
Ivar Ave	Between Yucca St and Hollywood Blvd	Residential/ Commercial	63.1	65.6	2.5	No
Vine St/ Franklin Ave	Between US-101 SB off-ramp and Yucca St	Commercial/ Hotel	64.4	67.0	2.6	No
Yucca St	Between Argyle Ave and N Gower St	Residential/ Religious	61.1	66.5	5.4	Yes
Yucca St	Between Vine St and Argyle Ave	Residential/ Commercial	63.7	67.2	3.5	No
Yucca St	Between Ivar Ave and Vine St	Commercial/ Educational	64.2	67.1	2.9	No

TABLE IV-I.11
ESTIMATE OF OFF-SITE CONSTRUCTION TRAFFIC NOISE LEVELS

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	dBA L_{eq}			
			Existing (A)	Existing + Project Construction (B)	Project Difference (B–A)	Exceed Threshold?
Option 2						
US-101 SB off-ramp	North of Hollywood Blvd	Freeway Ramp	64.8	65.3	0.5	No
Hollywood Blvd	Between N Bronson Ave and US-101 SB ramps	Commercial	69.3	70.1	0.8	No
Hollywood Blvd	Between Gower St and N Bronson Ave	Commercial/ Hotel/Religious	69.2	69.6	0.4	No
Hollywood Blvd	Between Argyle Ave and Gower St	Residential/ Commercial	69.1	70.1	1.0	No
Hollywood Blvd	Between Vine St and Argyle Ave	Commercial	68.9	71.1	2.2	No
Hollywood Blvd	Between Ivar Ave and Vine St	Commercial/ Hotel	68.6	69.2	0.6	No
Vine St	Between Yucca St and Hollywood Blvd	Commercial/ Educational	70	71.8	1.8	No

SOURCE: ESA, 2020; Fehr & Peers, 2020.

(b) Operational Impacts

(i) On-Site Operational Noise

(a) Fixed Mechanical Equipment

Mechanical equipment, such as heating, ventilation, and air conditioning (HVAC) units and cooling towers, would be located on the rooftops of both the West and East Sites under both the Project and the Project with the East Site Hotel Option. The rooftop equipment noise levels would attenuate greatly given their positions above and out of the line-of-sight from the street level. As shown in **Table IV.I-12,** *Operational Noise Levels*, the noise contribution from mechanical equipment would be minimal and far less than the ambient noise levels at the sensitive receptors. **Therefore, the mechanical equipment would not result in noise levels above the applicable standards, and impacts would be less than significant for the Project and the Project with the East Site Hotel Option.**

TABLE IV.I-12
OPERATIONAL NOISE LEVELS

Receptor	Daytime Ambient Noise Levels	West Site (dBA L_{eq})					East Site (dBA L_{eq})					East Site + West Site Composite Noise Level	Daytime Ambient + East Site + West Site Composite Noise Level	Increase in Composite Noise Level	Exceeds Threshold?
		West Site Plaza	Amenity Deck (Level 2), West Site	Amenity Terrace (Level 2), West Senior Building	Rooftop Terrace, West Senior Building	West Rooftop Mechanical	East Site Plaza, Performance Stage	East Site Plaza, Lounge and Garden	Amenity Deck (Level 2), East Site	Rooftop Terrace, East Senior Building	East Rooftop Mechanical				
1. Multi-family north of Yucca	59.9	20.3	39.9	39.0	34.6	18.5	34.9	17.5	28.8	25.4	18.7	44.0	60.0	0.1	No
2. Vine Lodge Hotel	73.0	38.4	36.2	18.2	24.6	19.3	31.2	20.3	28.9	14.8	18.4	41.4	73.0	0.0	No
3. Argyle House at southwest corner of Yucca St/Argyle Ave	68.3	19.2	29.8	9.4	15.1	16.2	48.6	64.8	56.9	31.2	17.2	65.5	70.1	1.8	No
4. Kimpton Everly Hotel	68.3	16.3	35.7	28.1	29.2	18.7	31.5	40.7	34.7	32.2	12.4	43.6	68.3	0.0	No
5. Multi-family east of Argyle	68.3	15.9	27.5	7.4	10.0	10.3	38.6	51.6	53.1	33.6	15.6	55.5	68.5	0.2	No
6. AMDA – Vine Building	64.9	29.1	49.8	39.6	30.5	14.9	36.6	21.5	31.4	14.0	11.4	50.5	65.1	0.2	No
7. AMDA Tower Building	64.9	21.7	52.4	44.1	34.6	19.1	32.0	31.1	41.9	29.8	18.6	53.5	65.2	0.3	No
8. Eastown multi-family	60.1	14.9	26.7	6.2	9.7	10.3	32.9	45.6	40.0	28.8	14.3	47.0	60.3	0.2	No
9. Pantages Theatre	60.1	18.3	29.3	8.3	10.7	11.9	38.6	31.9	59.7	32.2	12.9	59.8	62.9	2.8	No
10. The Lofts (Hollywood Equitable Building)	68.1	30.2	36.8	6.8	14.9	13.4	37.9	23.1	34.5	32.1	13.7	42.2	68.1	0.0	No
11. h Club Los Angeles (formerly Redbury Hotel)	68.1	35.7	34.9	11.3	14.6	16.4	68.6	46.2	35.2	16.8	14.1	68.6	71.4	3.3	No
12. The Knickerbocker Senior Residential	63.2	36.7	58.3	18.0	30.1	16.4	36.8	18.4	28.4	11.6	18.6	58.4	64.4	1.2	No
13. Multi-family (incl. St. Elmo Apts.) west of Ivar	62.7	21.0	46.8	14.3	23.0	13.1	30	15.8	24.7	7.3	8.2	47.0	62.8	0.1	No

SOURCE: ESA, 2020.

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(b) Outdoor Spaces

As discussed in Chapter II, *Project Description*, of the Draft EIR, the Project would incorporate publicly accessible open space and amenities, available to the general public, as well as common and private open space and recreational amenities for use by Project residents, guests, and employees. Although the open space areas on the East Site under the Project with the East Site Hotel Option would be slightly less than under the Project, noise levels resulting from open space activity would be similar to the Project. Therefore, open space noise levels were evaluated based on the Project's open space; however, the analysis is also applicable to the Project with the East Site Hotel Option.

(i) West Site Plaza

The West Site Plaza is located on Level 1 of the West Site and is an open space pedestrian area with a calculated maximum capacity of 510 people and approximate area of 7,656 square feet (actual capacity may be lower). As shown in Table IV.I-12, the West Site Plaza noise levels would be below the ambient noise levels at all sensitive receptor locations due to noise attenuation over distance and, in some cases, the presence of intervening structures that interrupt the line-of-sight to receptors.

(ii) Amenity Deck (Level 2), West Site

The Amenity Deck (Level 2), West Site is an open space area featuring a pool, garden, and open space for building residents with a calculated maximum capacity of 1,428 people and approximate area of 21,419 square feet (actual capacity may be lower). The Amenity Deck (Level 2), West Site would also include the use of background/ambient music speakers. It is anticipated that the background speakers would be ceiling mounted speakers, or small wall- or planter-mounted speakers that play background music. The sound level of background music is typically higher than the background noise level by 3 dB or more; for the purposes of this analysis, background music is assumed to be more than 5 dB higher than the applicable background noise level.[42] For this noise analysis, the sound level from the background music speakers is conservatively assumed to be 75 dBA at 25 feet, which is more than 5 dBA higher than the ambient noise levels in the vicinity of the Amenity Deck (Level 2), West Site, which ranges from approximately 62.7 to 64.9 dBA L_{eq}. As shown in Table IV.I-12, the Amenity Deck (Level 2), West Site noise levels would be less than 5 dBA over the ambient noise levels at all sensitive receptor locations due to noise attenuation over distance and, in some cases, the presence of intervening structures that interrupt the line-of-sight to receptors.

(iii) Amenity Terrace (Level 2), West Senior Building

The Amenity Terrace (Level 2), West Senior Building at the West Site is an open space area with a calculated maximum capacity of 72 people and approximate area of 1,080

[42] TOA Corporation, Soundindex/Background Music (BGM), https://www.toa.jp/soundoh_wiki/index.php?Soundindex/Background%20Music%28BGM%29, accessed February 28, 2020.

square feet (actual capacity may be lower). As shown in Table IV.I-12, the Amenity Terrace (Level 2), West Senior Building noise levels would be below the ambient noise levels at all sensitive receptor locations due to noise attenuation over distance and, in some cases, the presence of intervening structures that interrupt the line-of-sight to receptors.

(iv) Rooftop Terrace, West Senior Building

The Rooftop Terrace, West Senior Building on the West Site is an open space area with a calculated maximum capacity of 270 people and approximate area of 4,050 square feet (actual capacity may be lower). As shown in Table IV.I-12, the Rooftop Terrace, West Senior Building noise levels would be below the ambient noise levels at all sensitive receptor locations due to noise attenuation over distance and, in some cases, the presence of intervening structures that interrupt the line-of-sight to receptors.

(v) East Site Plaza, Lounge and Garden

The East Site Plaza, Lounge and Garden at the East Site is an open space pedestrian area with a calculated maximum capacity of 844 people and approximate area of 12,662 square feet (actual capacity may be lower). The plaza includes a palm grove, garden, outdoor library, and lounge area. As shown in Table IV.I-12, the East Site Plaza, Lounge and Garden noise levels would be below the ambient noise levels at all sensitive receptor locations due to noise attenuation over distance and, in some cases, the presence of intervening structures that interrupt the line-of-sight to receptors.

(vi) East Site Plaza, Performance Stage

The East Site Plaza, Performance Stage is an open space pedestrian area that would host occasional live, acoustic performances or provide prerecorded, low-level, background music via ambient music speakers. The stage area has a calculated maximum capacity of 350 people and approximate area of 10,198 square feet (actual capacity may be lower). As reflected in Project Design Feature NOI-PDF-3, the Project would not require or allow operation of any amplified sound system for performances in the outdoor plaza areas, including the East Site Plaza, Performance Stage. In addition, the acoustic performances or ambient music speakers with prerecorded, low-level, background music on the East Site Plaza, Performance Stage will be limited to a sound level of 85 dBA at 25 feet from the musicians. With incorporation of Project Design Feature NOI-PDF-3, as shown in Table IV.I-12, the Performance Stage noise levels would not exceed the 5 dBA over ambient threshold at off-site sensitive receptors due to noise attenuation over distance and, in some cases, the presence of intervening structures that interrupt the line-of-sight to receptors. In addition, performances at the Stage would be intermittent and relatively short in duration (approximately one to two hours). When the Stage is not being used for performances, the area would function as a passive seating area for pedestrians.

(vii) Amenity Deck (Level 2), East Site

The Amenity Deck (Level 2), East Site is an open space area featuring a pool and outdoor open space for building residents with a calculated maximum capacity of 547 people and approximate area of 8,200 square feet (actual capacity may be lower). The Amenity Deck (Level 2), East Site would also include the use of small background/ambient music speakers. It is anticipated that the small background speakers would be ceiling mounted speakers, or small wall- or planter-mounted speakers that play background music. For this noise analysis, the sound level from the background music speakers is conservatively assumed to be 75 dBA at 25 feet, which is more than 5 dBA higher than the ambient noise levels in the vicinity of the Amenity Deck (Level 2), East Site, which ranges from approximately 60.1 to 68.3 dBA L_{eq}. As shown in Table IV.I-12, the Amenity Deck (Level 2), East Site noise levels would be less than 5 dBA over the ambient noise levels at all sensitive receptor locations due to noise attenuation over distance and, in some cases, the presence of intervening structures that interrupt the line-of-sight to receptors.

(viii) Rooftop Terrace, East Senior Building

The Rooftop Terrace, East Senior Building on the East Site is an open space area with a calculated maximum capacity of 320 people and approximate area of 4,800 square feet (actual capacity may be lower). As shown in Table IV.I-12, the Rooftop Terrace, East Senior Building noise levels would be below the ambient noise levels at all sensitive receptor locations due to noise attenuation over distance and, in some cases, the presence of intervening structures that interrupt the line-of-sight to receptors.

(ix) Summary of Noise Impacts from Outdoor Spaces

As discussed and shown in Table IV.I-12, none of the outdoor spaces, including the West Site Plaza; Amenity Deck (Level 2), West Site; Amenity Terrace (Level 2), West Senior Building; Rooftop Terrace, West Senior Building; East Site Plaza, Lounge and Garden; East Site Plaza, Performance Stage; Amenity Deck (Level 2), East Site; and Rooftop Terrace, East Senior Building, would increase ambient noise levels greater than 5 dBA, and impacts would be less than significant for the Project and the Project with the East Site Hotel Option.

(c) Parking Facilities

Parking at both the West Site and East Site would consist of five below-grade levels with additional grade-level parking provided on the East Site. The grade level parking on the East Site would be completely enclosed. Since the below-grade and grade-level parking would be fully enclosed on all sides, noise generated within the parking structures would be shielded from off-site sensitive receptor locations in the immediate vicinity of the Project Site. **Therefore, noise generated by vehicles within the parking structures would be minimal, and impacts would be less than significant for the Project and the Project with the East Site Hotel Option.**

(d) Loading Docks and Refuse Collection

Loading docks and refuse collection areas would be located on Level 1 of both the West and East Site buildings. Loading areas for vendors, deliveries, and trash pickups would be completely enclosed at both sites and would shield the surrounding sensitive receptors from any noise from loading/unloading and refuse operations. **Therefore, noise from the loading docks and refuse collection would not result in excess noise levels at the surrounding sensitive receptors, and impacts would be less than significant for the Project and the Project with the East Site Hotel Option.**

(e) Emergency Generators

Stationary sources would also include emergency generator capacity for the residential buildings on the West Site and East Site with an estimated capacity rated at approximately 1,500 kilowatts (2,012 horsepower) for each site, which would provide emergency power primarily for lighting and other emergency building systems. The emergency generators would be located on the building rooftops within an enclosure that would substantially minimize noise levels to the environment. **Given their location on the rooftops within an enclosure, and their limited use, emergency generators would not contribute to an increase in day-to-day operational ambient noise levels, and impacts would be less than significant for the Project and the Project with the East Site Hotel Option.**

(f) On-Site Composite Noise Levels

Table IV.I-12, shows the composite noise levels of all operational sources at each sensitive receptor. This composite noise level represents the worst-case scenario that includes activity at all outdoor spaces and assumes an acoustic performance taking place at the East Site Plaza, Performance Stage. **Noise levels would be below the threshold of 5 dBA over ambient at all off-site sensitive receptors. Therefore, operational noise impacts would be less than significant for the Project and the Project with the East Site Hotel Option.**

(ii) Off-Site Traffic Noise

Traffic noise levels were analyzed for both the Project and the Project with the East Site Hotel Option. The difference in resulting noise levels between the two Project options were negligible and less than 0.1 dBA CNEL for all analyzed roadway segments (refer to calculation worksheets provided in Appendix K-2 of this Draft EIR). Therefore, traffic noise levels presented below represent calculated roadway noise levels that are applicable to both the Project and the Project with the East Site Hotel Option.

(a) Impacts Under Existing Traffic Baseline Conditions

Existing roadway noise levels were calculated along various roadway segments within the study area. Roadway noise attributable to Project operation was calculated using the traffic noise model previously described and was compared to existing noise levels in the vicinity.

Project impacts are shown in **Table IV.I-13**, *Off-Site Traffic Noise Impacts – Existing Plus Project*. The traffic noise levels in the table are the same as would occur under Existing plus Project with the East Site Hotel Option conditions; thus, the noise levels shown are applicable to the Project with the East Site Hotel Option. As indicated, the increase in traffic noise levels along all roadway segments would not exceed the significance threshold of a 3 dBA CNEL increase to or within the "normally unacceptable" or "clearly unacceptable" categories or the significant threshold of 5 dBA CNEL or greater noise increase (see Table IV.I-3). The maximum increase in Project-related traffic noise levels over existing traffic noise levels would be approximately 0.8 dBA CNEL (from 61.4 to 62.2 dBA CNEL) along Yucca Street between Argyle Avenue and North Gower Street and would not exceed the significance threshold of a 5 dBA CNEL increase for the "conditionally acceptable" category. Therefore, increases in traffic noise along this segment or any of the analyzed segments would not be significant. **Therefore, operation under Existing Plus Project and Project with East Site Hotel Option conditions would not result in off-site traffic-related noise impacts in excess of City standards, and impacts would be less than significant for the Project and the Project with the East Site Hotel Option.**

(b) Impacts Under Future (2027) Traffic Conditions

Future (2027) roadway noise levels were calculated along the same roadway segments as described previously under the existing traffic scenario and compared to 2027 traffic noise levels that would occur with implementation of the Project. Project impacts are shown in **Table IV.I-14**, *Off-Site Traffic Noise Impacts – Future (2027) Plus Project Conditions*. The traffic noise levels in the table are the same as would occur under Future (2027) plus Project with the East Site Hotel Option conditions; thus, the noise levels shown are applicable to the Project with the East Site Hotel Option. As indicated, the increase in traffic noise levels along all roadway segments would not exceed the significance threshold of 3 dBA CNEL increase to or within the "normally unacceptable" or "clearly unacceptable" categories or the significant threshold of any 5 dBA CNEL or greater noise increase (see Table IV.I-3). The maximum increase in Project-related traffic noise levels over Future (2027) traffic noise levels would be approximately 0.6 dBA CNEL (from 63.7 to 64.3 dBA CNEL) along Ivar Avenue between Hollywood Boulevard and Selma Avenue and would not exceed the significance threshold of a 5 dBA CNEL increase for the "conditionally acceptable" category. Therefore, increases in traffic noise along this segment or any of the analyzed segments would not be significant. **Therefore, operation under Future (2027) Plus Project and Project with the East Site Hotel Option conditions would not result in off-site traffic-related noise impacts in excess of City standards, and impacts would be less than significant for the Project and the Project with the East Site Hotel Option.**

TABLE IV.I-14
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2027) PLUS PROJECT CONDITIONS

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)			Exceed Threshold?
			Future (2027) (A)	Future + Project (B)	Project Increment[a] (B–A)	
Argyle Ave	Between Franklin Ave and US-101 SB on-ramp	Commercial	66.8	67.1	0.2	No
Argyle Ave	Between Hollywood Blvd and Selma Ave	Residential/ Commercial	66.9	67.0	0.1	No
Argyle Ave	Between US-101 SB on-ramp and Yucca St	Residential/ Commercial	65.9	66.0	0.1	No
Argyle Ave	Between Selma Ave and Sunset Blvd	Residential/ Commercial	67.3	67.5	0.2	No
Argyle Ave	Between Vine St/Dix St and Franklin Ave	Commercial	62.9	62.9	0.0	No
Argyle Ave	Between Yucca St and Hollywood Blvd	Residential/ Commercial	66.9	67.4	0.5	No
Argyle Ave	North of Vine St/Dix St	Residential	56.5	56.7	0.2	No
Beachwood Dr	North of Franklin Ave	Residential/ Educational	64.5	64.5	0.0	No
Beachwood Dr	South of Franklin Ave	Commercial/Motel	56.6	56.6	0.0	No
Bronson Ave	Between Hollywood Blvd and Sunset Blvd	Residential/ Commercial	66.1	66.1	0.0	No
Bronson Ave	Between Franklin Ave and Hollywood Blvd	Residential/ Commercial	66.7	66.7	0.0	No
Bronson Ave	North of Franklin Ave	Residential/ Commercial	63.1	63.1	0.0	No
Bronson Ave	South of Sunset Blvd	Residential/ Commercial/ Educational	67.4	67.4	0.0	No
Cahuenga Blvd	Between Hollywood and Selma Ave	Commercial	69.7	69.8	0.0	No
Cahuenga Blvd	Between Sunset and De Longpre Ave	Commercial	69.4	69.5	0.0	No
Cahuenga Blvd	Between De Longpre Ave and Fountain Ave	Residential/ Commercial	70.3	70.4	0.0	No

TABLE IV.I-14
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2027) PLUS PROJECT CONDITIONS

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)			Exceed Threshold?
			Future (2027) (A)	Future + Project (B)	Project Increment[a] (B–A)	
Cahuenga Blvd	Between Fountain Ave and Santa Monica	Residential/ Commercial/ Educational	70.3	70.4	0.1	No
Cahuenga Blvd	Between Santa Monica and Willoughby Ave	Commercial/ Educational	70.5	70.5	0.1	No
Cahuenga Blvd	Between Franklin Ave and Yucca St	Commercial/Motel	69.4	69.4	0.1	No
Cahuenga Blvd	Between US-101 NB off-ramp and US-101 SB off-ramp	Freeway Underpass	69.7	69.7	0.0	No
Cahuenga Blvd	Between US-101 SB off-ramp and US-101 SB on-ramp	Freeway Underpass	70.0	70.0	0.0	No
Cahuenga Blvd	Between US-101 SB on-ramp and Franklin Ave	Commercial	71.6	71.7	0.1	No
Cahuenga Blvd	Between Selma Ave and Sunset Blvd	Commercial	67.3	67.3	0.1	No
Cahuenga Blvd	Between Yucca St and Hollywood Blvd	Commercial	69.0	69.1	0.1	No
Cahuenga Blvd	North of US-101 NB off-ramp	Residential/Hotel	70.3	70.3	0.0	No
Cahuenga Blvd	Between Willoughby Ave and Melrose Ave	Commercial	70.2	70.2	0.0	No
Cahuenga Blvd	South of Melrose Ave	Residential	63.6	63.8	0.2	No
Camrose Dr/ Milner Rd	East of N Highland Ave	Residential	57.2	57.2	0.0	No
Camrose Dr/ Milner Rd	West of N Highland Ave	Residential	58.8	58.8	0.0	No
Carlos Ave	East of N Gower St	Residential/ Religious	55.2	55.2	0.0	No
Carlos Ave	West of N Gower St	Residential	54.1	54.1	0.0	No
Cole Ave	Between Fountain Ave and Santa Monica Blvd	Commercial	59.2	59.2	0.0	No

TABLE IV.I-14
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2027) PLUS PROJECT CONDITIONS

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)			Exceed Threshold?
			Future (2027) (A)	Future + Project (B)	Project Increment[a] (B–A)	
Cole Ave	North of Fountain Ave	Commercial	58.1	58.1	0.0	No
Cole Ave	South of Santa Monica Blvd	Commercial	61.9	61.9	0.0	No
De Longpre Ave	Between Cahuenga Blvd and Vine St	Commercial	63.2	63.3	0.0	No
De Longpre Ave	East of Vine St	Commercial	61.2	61.2	0.0	No
De Longpre Ave	West of Cahuenga Blvd	Commercial	62.6	62.7	0.0	No
Fountain Ave	Between Cahuenga Blvd and Vine St	Commercial	67.8	67.9	0.1	No
Fountain Ave	Between Cole Ave and Cahuenga Blvd	Residential	66.0	66.1	0.1	No
Fountain Ave	Between Vine St and El Centro Ave	Residential/ Commercial	67.5	67.6	0.1	No
Fountain Ave	East of El Centro Ave	Residential	67.1	67.2	0.1	No
Fountain Ave	West of Cole Ave	Residential/ Commercial	67.5	67.6	0.1	No
Franklin Ave	Between Argyle Ave and N Gower St	Residential/ Commercial	72.4	72.4	0.1	No
Franklin Ave	Between N Beachwood Dr and Bronson Ave	Commercial/ Educational/Hotel/ Residential	72.7	72.7	0.1	No
Franklin Ave	Between N Cahuenga Blvd and Vine St	Residential/ Commercial	65.3	65.4	0.1	No
Franklin Ave	Between N Gower St and N Beachwood Dr	Residential/ Commercial	72.5	72.6	0.1	No
Franklin Ave	Between N Highland Ave and Wilcox Ave	Residential/ Commercial	67.0	67.0	0.1	No
Franklin Ave	Between N La Brea Ave and Highland Ave	Residential/ Educational/Open Space	70.6	70.6	0.0	No

TABLE IV.I-14
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2027) PLUS PROJECT CONDITIONS

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)			Exceed Threshold?
			Future (2027) (A)	Future + Project (B)	Project Increment[a] (B–A)	
Franklin Ave	Between Wilcox Ave and N Cahuenga Blvd	Commercial	67.8	67.8	0.1	No
Franklin Ave	East of Bronson Ave	Residential/ Commercial	72.7	72.8	0.1	No
Franklin Ave	East of Highland Ave	Residential/ Religious	51.9	51.9	0.0	No
Franklin Ave	West of N Highland Ave	Residential	51.4	51.4	0.0	No
Franklin Ave	West of N La Brea Ave	Residential	62.4	62.5	0.1	No
Fuller Ave	North of Hollywood Blvd	Residential/ Commercial	61.5	61.5	0.0	No
Fuller Ave	South of Hollywood Blvd	Residential	60.1	60.1	0.0	No
Gower St	Between Carlos Ave and Hollywood Blvd	Residential/ Commercial	69.7	69.8	0.1	No
Gower St	Between Franklin Ave and US-101 NB off-ramp	Commercial/Hotel	68.8	68.8	0.0	No
Gower St	Between US-101 NB off-ramp and US-101 SB off-ramp/Yucca St	Religious/Open Space	69.7	69.7	0.0	No
Gower St	Between US-101 SB off-ramp/Yucca St and Yucca St	Religious/Open Space	67.0	67.1	0.1	No
Gower St	Between Selma Ave and Sunset Blvd	Residential/ Commercial	68.9	69.0	0.0	No
Gower St	Between Yucca St and Carlos Ave	Residential/ Religious/ Educational	67.3	67.4	0.1	No
Gower St	North of Franklin Ave	Residential	69.6	69.7	0.1	No
Gower St	Between Hollywood Blvd and Selma Ave	Residential/ Commercial	69.6	69.6	0.0	No
Gower St	South of Sunset Blvd	Residential/ Commercial	60.4	60.5	0.1	No

TABLE IV.I-14
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2027) PLUS PROJECT CONDITIONS

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)			Exceed Threshold?
			Future (2027) (A)	Future + Project (B)	Project Increment[a] (B–A)	
Hawthorne Ave	East of N La Brea Ave	Residential/ Educational/Hotel	61.5	61.5	0.0	No
Hawthorne Ave	West of N La Brea Ave	Residential/ Commercial	53.6	53.6	0.0	No
Highland Ave	Between Franklin Ave and Hollywood Blvd	Residential/ Commercial	73.8	73.8	0.0	No
Highland Ave	Between Hollywood Blvd and Selma Ave	Commercial/ Educational	73.8	73.8	0.0	No
Highland Ave	Between Camrose Dr/Milner Rd and Franklin Ave	Commercial/Hotel	71.7	71.7	0.0	No
Highland Ave	Between Franklin Ave and Franklin Ave	Commercial	71.2	71.2	0.0	No
Highland Ave	Between Selma Ave and Sunset Blvd	Commercial/ Educational	71.2	71.2	0.0	No
Highland Ave	North of Camrose Dr/Milner Rd	Residential/Open Space	74.0	74.0	0.0	No
Highland Ave	South of Sunset Blvd	Residential/ Commercial	71.1	71.1	0.0	No
Hollywood Blvd	Between Argyle Ave and Gower St	Residential/ Commercial	71.4	71.5	0.2	No
Hollywood Blvd	Between Cahuenga Blvd and Ivar Ave	Commercial	70.6	70.8	0.2	No
Hollywood Blvd	Between Gower St and N Bronson Ave	Commercial/Hotel/ Religious	71.9	72.0	0.1	No
Hollywood Blvd	Between Highland Ave and Wilcox Ave	Commercial	70.2	70.3	0.1	No
Hollywood Blvd	Between US-101 SB ramps and US-101 NB ramps/Van Ness Ave	Freeway Overpass	70.7	70.9	0.2	No
Hollywood Blvd	Between Ivar Ave and Vine St	Commercial/Hotel	71.9	72.0	0.1	No
Hollywood Blvd	Between N Bronson Ave and US-101 SB ramps	Commercial	71.6	71.7	0.0	No

TABLE IV.I-14
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2027) PLUS PROJECT CONDITIONS

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)			Exceed Threshold?
			Future (2027) (A)	Future + Project (B)	Project Increment[a] (B–A)	
Hollywood Blvd	Between N Fuller Ave and N La Brea Ave	Residential/ Commercial/ Religious	70.0	70.1	0.1	No
Hollywood Blvd	Between N La Brea Ave and Orange Dr	Commercial	69.9	70.0	0.1	No
Hollywood Blvd	Between Orange Dr and Highland Ave	Commercial/Hotel	72.1	72.2	0.1	No
Hollywood Blvd	Between Vine St and Argyle Ave	Commercial	71.1	71.2	0.2	No
Hollywood Blvd	Between Wilcox Ave and Cahuenga Blvd	Commercial/ Medical	70.8	70.9	0.1	No
Hollywood Blvd	East of US-101 NB ramps/Van Ness Ave	Commercial	72.0	72.1	0.1	No
Hollywood Blvd	West of N Fuller Ave	Residential	73.3	73.3	0.0	No
Ivar Ave	Between Hollywood Blvd and Selma Ave	Residential/ Commercial/ Library	63.7	64.3	0.6	No
Ivar Ave	Between Selma Ave and Sunset Blvd	Commercial/ Educational	64.5	65.0	0.5	No
Ivar Ave	Between Yucca St and Hollywood Blvd	Residential/ Commercial	63.5	64.0	0.5	No
Ivar Ave	North of Yucca St	Residential	55.8	55.8	0.0	No
Ivar Ave	South of Sunset Blvd	Commercial	64.4	64.8	0.4	No
La Brea Ave	Between Franklin Ave and Hollywood Blvd	Residential/ Commercial/ Religious/ Educational	70.8	70.8	0.0	No
La Brea Ave	Between Hollywood Blvd and Hawthorne Ave	Residential/ Commercial	70.2	70.2	0.0	No
La Brea Ave	North of Franklin Ave	Residential	59.9	59.9	0.0	No
La Brea Ave	South of Hawthorne Ave	Residential/ Commercial	70.8	70.8	0.0	No

TABLE IV.I-14
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2027) PLUS PROJECT CONDITIONS

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)			Exceed Threshold?
			Future (2027) (A)	Future + Project (B)	Project Increment[a] (B–A)	
Lexington Ave	East of Vine St	Residential/ Commercial	60.5	60.5	0.0	No
Lexington Ave	West of Vine St	Residential/ Educational	61.2	61.2	0.0	No
Melrose Ave	Between Cahuenga Blvd and Vine St	Commercial	72.0	72.0	0.0	No
Melrose Ave	East of Vine St	Commercial/ Senior Care	72.3	72.3	0.0	No
Melrose Ave	West of Cahuenga Blvd	Residential/ Commercial	73.4	73.4	0.0	No
Orange Dr	North of Hollywood Blvd	Residential	61.3	61.3	0.0	No
Orange Dr	South of Hollywood Blvd	Commercial/Hotel	60.2	60.2	0.0	No
Santa Monica Blvd	Between Cahuenga Blvd and Vine St	Commercial	72.2	72.2	0.0	No
Santa Monica Blvd	Between Cole Ave and Cahuenga Blvd	Commercial/Open Space	72.2	72.2	0.0	No
Santa Monica Blvd	Between Vine St and El Centro Ave	Commercial	72.2	72.2	0.0	No
Santa Monica Blvd	East of El Centro Ave	Commercial	72.3	72.3	0.0	No
Santa Monica Blvd	West of Cole Ave	Commercial	73.6	73.7	0.0	No
Selma Ave	Between Argyle Ave and N Gower St	Commercial/Hotel	65.8	65.8	0.0	No
Selma Ave	Between Ivar Ave and Vine St	Residential/ Commercial	64.7	64.8	0.0	No
Selma Ave	Between N Cahuenga Blvd and Ivar Ave	Commercial	64.8	64.9	0.1	No
Selma Ave	Between N Highland Ave and N Cahuenga Blvd	Commercial/ Educational/ Religious	63.8	63.9	0.1	No
Selma Ave	Between Vine St and Argyle Ave	Residential/ Commercial	67.2	67.2	0.0	No
Selma Ave	East of N Gower St	Residential	51.7	51.7	0.0	No

TABLE IV.I-14
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2027) PLUS PROJECT CONDITIONS

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)			Exceed Threshold?
			Future (2027) (A)	Future + Project (B)	Project Increment[a] (B–A)	
Sunset Blvd	Between Argyle Ave and Gower St	Commercial	73.6	73.6	0.0	No
Sunset Blvd	Between Cahuenga Blvd and Ivar Ave	Commercial	73.0	73.1	0.0	No
Sunset Blvd	Between Gower St and Bronson Ave	Commercial/Hotel	73.7	73.8	0.0	No
Sunset Blvd	Between Ivar Ave and Vine St	Commercial/ Educational	73.1	73.2	0.0	No
Sunset Blvd	Between N Highland Ave and Wilcox Ave	Commercial/ Educational/ Religious	72.9	72.9	0.0	No
Sunset Blvd	Between Vine St and Argyle Ave	Commercial	73.6	73.7	0.0	No
Sunset Blvd	Between Wilcox Ave and Cahuenga Blvd	Commercial	73.3	73.3	0.0	No
Sunset Blvd	East of Bronson Ave	Residential/ Commercial	74.0	74.1	0.1	No
Sunset Blvd	West of N Highland Ave	Commercial/ Educational/Motel	74.1	74.2	0.0	No
US-101 NB off-ramp	Off-ramp East of N Cahuenga Blvd	Freeway Ramp	62.5	62.5	0.0	No
US-101 NB off-ramp	Off-ramp East of N Gower St	Freeway Ramp	62.2	62.3	0.1	No
US-101 NB ramps/Van Ness Ave	Ramps/Van Ness Ave North of Hollywood Blvd	Freeway Ramp	68.2	68.2	0.0	No
US-101 NB ramps/Van Ness Ave	Ramps/Van Ness Ave South of Hollywood Blvd	Freeway Ramp	65.9	66.2	0.3	No
US-101 SB off-ramp	Off-ramp Between Vine St/Franklin Ave and Argyle Ave	Freeway Ramp	73.3	73.3	0.1	No
US-101 SB off-ramp	Off-ramp West of N Cahuenga Blvd	Freeway Ramp	68.9	68.9	0.0	No
US-101 SB off-ramp/Yucca St	Off-ramp/Yucca St East of N Gower St	Freeway Ramp	55.3	55.3	0.0	No
US-101 SB off-ramp/Yucca St	Off-ramp/Yucca St West of N Gower St	Freeway Ramp	64.5	64.5	0.0	No

TABLE IV.I-14
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2027) PLUS PROJECT CONDITIONS

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)			Exceed Threshold?
			Future (2027) (A)	Future + Project (B)	Project Increment[a] (B–A)	
US-101 SB on-ramp	On-ramp East of Argyle Ave	Freeway Ramp	62.0	62.3	0.2	No
US-101 SB on-ramp	On-ramp East of N Cahuenga Blvd	Freeway Ramp	60.2	60.2	0.0	No
US-101 SB ramps	Ramps north of Hollywood Blvd	Freeway Ramp	65.9	65.7	-0.2[b]	No
US-101 SB ramps	Ramps South of Hollywood Blvd	Freeway Ramp	64.5	64.7	0.1	No
Vine St	Between Fountain Ave and Lexington Ave	Commercial	71.7	71.7	0.0	No
Vine St	Between Hollywood Blvd and Selma Ave	Residential/ Commercial/Hotel	71.4	71.5	0.1	No
Vine St	Between Santa Monica Blvd and Willoughby Ave	Commercial/ Educational	71.3	71.3	0.0	No
Vine St	Between Sunset Blvd and De Longpre Ave	Residential/ Commercial	72.0	72.1	0.1	No
Vine St	Between De Longpre Ave and Fountain Ave	Commercial	71.9	71.9	0.0	No
Vine St	Between Lexington Ave and Santa Monica Blvd	Commercial/Hotel	71.7	71.7	0.0	No
Vine St	Between Selma Ave and Sunset Blvd	Residential/ Commercial	71.4	71.5	0.1	No
Vine St	Between Willoughby Ave and Melrose Ave	Commercial/Motel	71.1	71.2	0.0	No
Vine St	Between Yucca St and Hollywood Blvd	Commercial/ Educational	70.9	70.9	0.0	No
Vine St	South of Melrose Ave	Residential/ Religious	70.9	70.9	0.1	No
Vine St/Dix St	East of Argyle Ave	Freeway Underpass	56.7	56.7	0.0	No
Vine St/Dix St	West of Argyle Ave	Commercial/Hotel	57.6	57.6	0.0	No

TABLE IV.I-14
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2027) PLUS PROJECT CONDITIONS

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)			Exceed Threshold?
			Future (2027) (A)	Future + Project (B)	Project Increment[a] (B–A)	
Vine St/ Franklin Ave	Between US-101 SB off-ramp and Yucca St	Commercial/Hotel	65.5	65.5	0.0	No
Wilcox Ave	Between Franklin Ave and Yucca St	Residential/ Commercial	65.5	65.5	0.0	No
Wilcox Ave	Between Hollywood Blvd and Sunset Blvd	Commercial	68.0	68.0	0.0	No
Wilcox Ave	Between Yucca St and Hollywood Blvd	Residential/ Commercial	66.6	66.6	0.0	No
Wilcox Ave	North of Franklin Ave	Residential/ Commercial	64.1	64.1	0.0	No
Wilcox Ave	South of Sunset Blvd	Commercial	66.2	66.2	0.0	No
Willoughby Ave	Between Cahuenga Blvd and Vine St	Commercial/ Educational	64.8	64.8	0.0	No
Willoughby Ave	East of Vine St	Residential	62.0	62.0	0.0	No
Willoughby Ave	West of Cahuenga Blvd	Commercial	66.3	66.3	0.0	No
Yucca St	Between Argyle Ave and N Gower St	Residential/ Religious	63.6	64.1	0.5	No
Yucca St	Between Ivar Ave and Vine St	Commercial/ Educational	64.8	65.2	0.4	No
Yucca St	Between N Cahuenga Blvd and Ivar Ave	Residential/ Commercial	63.2	63.6	0.5	No
Yucca St	Between Vine St and Argyle Ave	Residential/ Commercial	64.9	65.4	0.5	No
Yucca St	Between Wilcox Ave and N Cahuenga Blvd	Residential/ Commercial	59.5	59.6	0.0	No
Yucca St	West of Wilcox Ave	Residential	58.0	58.0	0.0	No

[a] Values may not add up exactly due to rounding in the modeling calculations.

[b] Negative value represents a relatively small decrease in traffic as projected in the traffic model, which reflects estimated travel patterns and the estimated traffic volume data, including the Project data that accounts for transportation network carrier (TNC) trips.

SOURCE: ESA, 2020.

(c) Impacts Under Future (2040) Traffic Conditions

Future (2040) roadway noise levels were calculated along the same roadway segments as described previously under the existing traffic scenario and compared to 2040 traffic noise levels that would occur with implementation of the Project. Project impacts are shown in **Table IV.I-15**, *Off-Site Traffic Noise Impacts – Future (2040) Plus Project Conditions*. The traffic noise levels in the table are the same as would occur under Future (2040) plus Project with the East Site Hotel Option conditions; thus, the noise levels shown are applicable to the Project with the East Site Hotel Option. As indicated, the increase in traffic noise levels along all roadway segments would not exceed the significance threshold of 3 dBA CNEL increase to or within the "normally unacceptable" or "clearly unacceptable" categories or the significant threshold of any 5 dBA CNEL or greater noise increase (see Table IV.I-3). The maximum increase in Project-related traffic noise levels over Future (2027) traffic noise levels would be approximately 0.6 dBA CNEL (from 63.9 to 64.5 dBA CNEL) along Ivar Avenue between Hollywood Boulevard and Selma Avenue and would not exceed the significance threshold of a 5 dBA CNEL increase for the "conditionally acceptable" category. Therefore, increases in traffic noise along this segment or any of the analyzed segments would not be significant. **Therefore, operation under Future (2040) Plus Project and Project with East Site Hotel Option conditions would not result in off-site traffic-related noise impacts in excess of City standards, and impacts would be less than significant for the Project and the Project with the East Site Hotel Option.**

TABLE IV.I-15
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2040) PLUS PROJECT CONDITIONS

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)			Exceed Threshold?
			Future (2040) (A)	Future + Project (B)	Project Increment[a] (B–A)	
Argyle Ave	Between Franklin Ave and US-101 SB on-ramp	Commercial	67.0	67.2	0.2	No
Argyle Ave	Between Hollywood Blvd and Selma Ave	Residential/ Commercial	67.0	67.1	0.1	No
Argyle Ave	Between US-101 SB on-ramp and Yucca St	Residential/ Commercial	66.0	66.1	0.1	No
Argyle Ave	Between Selma Ave and Sunset Blvd	Residential/ Commercial	67.4	67.7	0.2	No
Argyle Ave	Between Vine St/Dix St and Franklin Ave	Commercial	63.1	63.1	0.0	No
Argyle Ave	Between Yucca St and Hollywood Blvd	Residential/ Commercial	67.0	67.5	0.5	No

TABLE IV.I-15
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2040) PLUS PROJECT CONDITIONS

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)			Exceed Threshold?
			Future (2040) (A)	Future + Project (B)	Project Increment[a] (B–A)	
Argyle Ave	North of Vine St/Dix St	Residential	56.8	56.9	0.1	No
Beachwood Dr	North of Franklin Ave	Residential/ Educational	64.7	64.7	0.0	No
Beachwood Dr	South of Franklin Ave	Commercial/Motel	56.9	56.9	0.0	No
Bronson Ave	Between Hollywood Blvd and Sunset Blvd	Residential/ Commercial	66.3	66.3	0.0	No
Bronson Ave	Between Franklin Ave and Hollywood Blvd	Residential/ Commercial	66.9	66.9	0.0	No
Bronson Ave	North of Franklin Ave	Residential/ Commercial	63.3	63.3	0.0	No
Bronson Ave	South of Sunset Blvd	Residential/ Commercial/ Educational	67.6	67.6	0.0	No
Cahuenga Blvd	Between Hollywood and Selma Ave	Commercial	69.9	69.9	0.0	No
Cahuenga Blvd	Between Sunset and De Longpre Ave	Commercial	69.6	69.6	0.0	No
Cahuenga Blvd	Between De Longpre Ave and Fountain Ave	Residential/ Commercial	70.5	70.5	0.0	No
Cahuenga Blvd	Between Fountain Ave and Santa Monica	Residential/ Commercial/ Educational	70.5	70.5	0.1	No
Cahuenga Blvd	Between Santa Monica and Willoughby Ave	Commercial/ Educational	70.6	70.7	0.1	No
Cahuenga Blvd	Between Franklin Ave and Yucca St	Commercial/Motel	69.5	69.6	0.1	No
Cahuenga Blvd	Between US-101 NB off-ramp and US-101 SB off-ramp	Freeway Underpass	69.9	69.9	0.0	No
Cahuenga Blvd	Between US-101 SB off-ramp and US-101 SB on-ramp	Freeway Underpass	70.1	70.2	0.0	No

TABLE IV.I-15
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2040) PLUS PROJECT CONDITIONS

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)			Exceed Threshold?
			Future (2040) (A)	Future + Project (B)	Project Increment[a] (B–A)	
Cahuenga Blvd	Between US-101 SB on-ramp and Franklin Ave	Commercial	71.8	71.8	0.1	No
Cahuenga Blvd	Between Selma Ave and Sunset Blvd	Commercial	67.4	67.5	0.1	No
Cahuenga Blvd	Between Yucca St and Hollywood Blvd	Commercial	69.1	69.2	0.1	No
Cahuenga Blvd	North of US-101 NB off-ramp	Residential/Hotel	70.4	70.4	0.0	No
Cahuenga Blvd	Between Willoughby Ave and Melrose Ave	Commercial	70.3	70.4	0.0	No
Cahuenga Blvd	South of Melrose Ave	Residential	63.7	63.9	0.2	No
Camrose Dr/ Milner Rd	East of N Highland Ave	Residential	57.3	57.3	0.0	No
Camrose Dr/ Milner Rd	West of N Highland Ave	Residential	59.0	59.0	0.0	No
Carlos Ave	East of N Gower St	Residential/ Religious	55.4	55.4	0.0	No
Carlos Ave	West of N Gower St	Residential	54.4	54.4	0.0	No
Cole Ave	Between Fountain Ave and Santa Monica Blvd	Commercial	59.5	59.5	0.0	No
Cole Ave	North of Fountain Ave	Commercial	58.3	58.3	0.0	No
Cole Ave	South of Santa Monica Blvd	Commercial	62.1	62.1	0.0	No
De Longpre Ave	Between Cahuenga Blvd and Vine St	Commercial	63.3	63.4	0.0	No
De Longpre Ave	East of Vine St	Commercial	61.4	61.4	0.0	No
De Longpre Ave	West of Cahuenga Blvd	Commercial	62.8	62.9	0.0	No
Fountain Ave	Between Cahuenga Blvd and Vine St	Commercial	68.0	68.1	0.1	No
Fountain Ave	Between Cole Ave and Cahuenga Blvd	Residential	66.2	66.3	0.1	No

TABLE IV.I-15
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2040) PLUS PROJECT CONDITIONS

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)			Exceed Threshold?
			Future (2040) (A)	Future + Project (B)	Project Increment[a] (B–A)	
Fountain Ave	Between Vine St and El Centro Ave	Residential/ Commercial	67.7	67.8	0.1	No
Fountain Ave	East of El Centro Ave	Residential	67.3	67.4	0.1	No
Fountain Ave	West of Cole Ave	Residential/ Commercial	67.7	67.8	0.1	No
Franklin Ave	Between Argyle Ave and N Gower St	Residential/ Commercial	72.6	72.6	0.1	No
Franklin Ave	Between N Beachwood Dr and Bronson Ave	Commercial/ Educational/Hotel/ Residential	72.9	72.9	0.1	No
Franklin Ave	Between N Cahuenga Blvd and Vine St	Residential/ Commercial	65.5	65.5	0.1	No
Franklin Ave	Between N Gower St and N Beachwood Dr	Residential/ Commercial	72.7	72.8	0.1	No
Franklin Ave	Between N Highland Ave and Wilcox Ave	Residential/ Commercial	67.2	67.2	0.1	No
Franklin Ave	Between N La Brea Ave and Highland Ave	Residential/ Educational/Open Space	70.8	70.8	0.0	No
Franklin Ave	Between Wilcox Ave and N Cahuenga Blvd	Commercial	68.0	68.0	0.1	No
Franklin Ave	East of Bronson Ave	Residential/ Commercial	72.9	73.0	0.1	No
Franklin Ave	East of Highland Ave	Residential/ Religious	52.1	52.1	0.0	No
Franklin Ave	West of N Highland Ave	Residential	51.4	51.4	0.0	No
Franklin Ave	West of N La Brea Ave	Residential	62.6	62.7	0.1	No
Fuller Ave	North of Hollywood Blvd	Residential/ Commercial	61.7	61.7	0.0	No
Fuller Ave	South of Hollywood Blvd	Residential	60.3	60.3	0.0	No

TABLE IV.I-15
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2040) PLUS PROJECT CONDITIONS

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)			
			Future (2040) (A)	Future + Project (B)	Project Increment[a] (B–A)	Exceed Threshold?
Gower St	Between Carlos Ave and Hollywood Blvd	Residential/ Commercial	69.9	70.0	0.1	No
Gower St	Between Franklin Ave and US-101 NB off-ramp	Commercial/Hotel	69.0	69.0	0.0	No
Gower St	Between US-101 NB off-ramp and US-101 SB off-ramp/Yucca St	Religious/Open Space	69.9	69.8	0.0	No
Gower St	Between US-101 SB off-ramp/Yucca St and Yucca St	Religious/Open Space	67.2	67.3	0.1	No
Gower St	Between Selma Ave and Sunset Blvd	Residential/ Commercial	69.1	69.1	0.0	No
Gower St	Between Yucca St and Carlos Ave	Residential/ Religious/ Educational	67.5	67.6	0.1	No
Gower St	North of Franklin Ave	Residential	69.7	69.8	0.1	No
Gower St	Between Hollywood Blvd and Selma Ave	Residential/ Commercial	69.8	69.7	0.0	No
Gower St	South of Sunset Blvd	Residential/ Commercial	60.6	60.7	0.0	No
Hawthorne Ave	East of N La Brea Ave	Residential/ Educational/Hotel	61.8	61.8	0.0	No
Hawthorne Ave	West of N La Brea Ave	Residential/ Commercial	53.8	53.8	0.0	No
Highland Ave	Between Franklin Ave and Hollywood Blvd	Residential/ Commercial	74.0	74.0	0.0	No
Highland Ave	Between Hollywood Blvd and Selma Ave	Commercial/ Educational	74.0	74.0	0.0	No
Highland Ave	Between Camrose Dr/Milner Rd and Franklin Ave	Commercial/Hotel	71.9	71.9	0.0	No
Highland Ave	Between Franklin Ave and Franklin Ave	Commercial	71.3	71.3	0.0	No
Highland Ave	Between Selma Ave and Sunset Blvd	Commercial/ Educational	71.3	71.3	0.0	No

TABLE IV.I-15
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2040) PLUS PROJECT CONDITIONS

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)			
			Future (2040) (A)	Future + Project (B)	Project Increment[a] (B–A)	Exceed Threshold?
Highland Ave	North of Camrose Dr/ Milner Rd	Residential/Open Space	74.2	74.2	0.0	No
Highland Ave	South of Sunset Blvd	Residential/ Commercial	71.3	71.3	0.0	No
Hollywood Blvd	Between Argyle Ave and Gower St	Residential/ Commercial	71.5	71.7	0.2	No
Hollywood Blvd	Between Cahuenga Blvd and Ivar Ave	Commercial	70.7	70.9	0.2	No
Hollywood Blvd	Between Gower St and N Bronson Ave	Commercial/Hotel/ Religious	72.0	72.1	0.1	No
Hollywood Blvd	Between Highland Ave and Wilcox Ave	Commercial	70.4	70.4	0.1	No
Hollywood Blvd	Between US-101 SB ramps and US-101 NB ramps/Van Ness Ave	Freeway Overpass	70.8	71.0	0.2	No
Hollywood Blvd	Between Ivar Ave and Vine St	Commercial/Hotel	72.1	72.2	0.1	No
Hollywood Blvd	Between N Bronson Ave and US-101 SB ramps	Commercial	71.8	71.8	0.0	No
Hollywood Blvd	Between N Fuller Ave and N La Brea Ave	Residential/ Commercial/ Religious	70.2	70.2	0.1	No
Hollywood Blvd	Between N La Brea Ave and Orange Dr	Commercial	70.1	70.2	0.1	No
Hollywood Blvd	Between Orange Dr and Highland Ave	Commercial/Hotel	72.3	72.4	0.1	No
Hollywood Blvd	Between Vine St and Argyle Ave	Commercial	71.2	71.4	0.2	No
Hollywood Blvd	Between Wilcox Ave and Cahuenga Blvd	Commercial/ Medical	70.9	71.0	0.1	No
Hollywood Blvd	East of US-101 NB ramps/Van Ness Ave	Commercial	72.2	72.3	0.1	No
Hollywood Blvd	West of N Fuller Ave	Residential	73.4	73.4	0.0	No

TABLE IV.I-15
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2040) PLUS PROJECT CONDITIONS

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)			
			Future (2040) (A)	Future + Project (B)	Project Increment[a] (B–A)	Exceed Threshold?
Ivar Ave	Between Hollywood Blvd and Selma Ave	Residential/ Commercial/ Library	63.9	64.5	0.6	No
Ivar Ave	Between Selma Ave and Sunset Blvd	Commercial/ Educational	64.7	65.2	0.5	No
Ivar Ave	Between Yucca St and Hollywood Blvd	Residential/ Commercial	63.7	64.2	0.5	No
Ivar Ave	North of Yucca St	Residential	56.0	56.0	0.0	No
Ivar Ave	South of Sunset Blvd	Commercial	64.6	65.0	0.4	No
La Brea Ave	Between Franklin Ave and Hollywood Blvd	Residential/ Commercial/ Religious/ Educational	71.0	71.0	0.0	No
La Brea Ave	Between Hollywood Blvd and Hawthorne Ave	Residential/ Commercial	70.4	70.4	0.0	No
La Brea Ave	North of Franklin Ave	Residential	60.1	60.1	0.0	No
La Brea Ave	South of Hawthorne Ave	Residential/ Commercial	71.0	71.0	0.0	No
Lexington Ave	East of Vine St	Residential/ Commercial	60.7	60.7	0.0	No
Lexington Ave	West of Vine St	Residential/ Educational	61.4	61.4	0.0	No
Melrose Ave	Between Cahuenga Blvd and Vine St	Commercial	72.2	72.2	0.0	No
Melrose Ave	East of Vine St	Commercial/ Senior Care	72.5	72.5	0.0	No
Melrose Ave	West of Cahuenga Blvd	Residential/ Commercial	73.6	73.6	0.0	No
Orange Dr	North of Hollywood Blvd	Residential	61.5	61.5	0.0	No
Orange Dr	South of Hollywood Blvd	Commercial/Hotel	60.5	60.5	0.0	No
Santa Monica Blvd	Between Cahuenga Blvd and Vine St	Commercial	72.3	72.4	0.0	No
Santa Monica Blvd	Between Cole Ave and Cahuenga Blvd	Commercial/Open Space	72.4	72.4	0.0	No

TABLE IV.I-15
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2040) PLUS PROJECT CONDITIONS

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)			Exceed Threshold?
			Future (2040) (A)	Future + Project (B)	Project Increment[a] (B–A)	
Santa Monica Blvd	Between Vine St and El Centro Ave	Commercial	72.4	72.4	0.0	No
Santa Monica Blvd	East of El Centro Ave	Commercial	72.4	72.5	0.0	No
Santa Monica Blvd	West of Cole Ave	Commercial	73.8	73.8	0.0	No
Selma Ave	Between Argyle Ave and N Gower St	Commercial/Hotel	65.9	65.9	0.0	No
Selma Ave	Between Ivar Ave and Vine St	Residential/ Commercial	64.9	64.9	0.0	No
Selma Ave	Between N Cahuenga Blvd and Ivar Ave	Commercial	64.9	65.0	0.1	No
Selma Ave	Between N Highland Ave and N Cahuenga Blvd	Commercial/ Educational/ Religious	63.9	64.0	0.1	No
Selma Ave	Between Vine St and Argyle Ave	Residential/ Commercial	67.3	67.3	0.0	No
Selma Ave	East of N Gower St	Residential	51.9	51.9	0.0	No
Sunset Blvd	Between Argyle Ave and Gower St	Commercial	73.7	73.8	0.0	No
Sunset Blvd	Between Cahuenga Blvd and Ivar Ave	Commercial	73.2	73.2	0.0	No
Sunset Blvd	Between Gower St and Bronson Ave	Commercial/Hotel	73.9	73.9	0.0	No
Sunset Blvd	Between Ivar Ave and Vine St	Commercial/ Educational	73.3	73.3	0.0	No
Sunset Blvd	Between N Highland Ave and Wilcox Ave	Commercial/ Educational/ Religious	73.1	73.1	0.0	No
Sunset Blvd	Between Vine St and Argyle Ave	Commercial	73.8	73.8	0.0	No
Sunset Blvd	Between Wilcox Ave and Cahuenga Blvd	Commercial	73.4	73.5	0.0	No
Sunset Blvd	East of Bronson Ave	Residential/ Commercial	74.1	74.2	0.1	No

TABLE IV.I-15
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2040) PLUS PROJECT CONDITIONS

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)			Exceed Threshold?
			Future (2040) (A)	Future + Project (B)	Project Increment[a] (B–A)	
Sunset Blvd	West of N Highland Ave	Commercial/ Educational/Motel	74.3	74.3	0.0	No
US-101 NB off-ramp	Off-ramp East of N Cahuenga Blvd	Freeway Ramp	62.7	62.7	0.0	No
US-101 NB off-ramp	Off-ramp East of N Gower St	Freeway Ramp	62.3	62.5	0.1	No
US-101 NB ramps/Van Ness Ave	Ramps/Van Ness Ave north of Hollywood Blvd	Freeway Ramp	68.4	68.4	0.0	No
US-101 NB ramps/Van Ness Ave	Ramps/Van Ness Ave South of Hollywood Blvd	Freeway Ramp	66.1	66.4	0.3	No
US-101 SB off-ramp	Off-ramp Between Vine St/Franklin Ave and Argyle Ave	Freeway Ramp	73.4	73.5	0.1	No
US-101 SB off-ramp	Off-ramp West of N Cahuenga Blvd	Freeway Ramp	69.1	69.1	0.0	No
US-101 SB off-ramp/Yucca St	Off-ramp/Yucca St East of N Gower St	Freeway Ramp	55.5	55.5	0.0	No
US-101 SB off-ramp/Yucca St	Off-ramp/Yucca St West of N Gower St	Freeway Ramp	64.7	64.7	0.0	No
US-101 SB on-ramp	On-ramp East of Argyle Ave	Freeway Ramp	62.2	62.4	0.2	No
US-101 SB on-ramp	On-ramp East of N Cahuenga Blvd	Freeway Ramp	60.3	60.3	0.0	No
US-101 SB ramps	Ramps north of Hollywood Blvd	Freeway Ramp	66.1	65.9	-0.2[b]	No
US-101 SB ramps	Ramps south of Hollywood Blvd	Freeway Ramp	64.6	64.8	0.1	No
Vine St	Between Fountain Ave and Lexington Ave	Commercial	71.8	71.9	0.0	No
Vine St	Between Hollywood Blvd and Selma Ave	Residential/ Commercial/Hotel	71.6	71.6	0.1	No
Vine St	Between Santa Monica Blvd and Willoughby Ave	Commercial/ Educational	71.5	71.5	0.0	No

TABLE IV.I-15
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2040) PLUS PROJECT CONDITIONS

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)			Exceed Threshold?
			Future (2040) (A)	Future + Project (B)	Project Increment[a] (B–A)	
Vine St	Between Sunset Blvd and De Longpre Ave	Residential/ Commercial	72.2	72.2	0.1	No
Vine St	Between De Longpre Ave and Fountain Ave	Commercial	72.0	72.1	0.0	No
Vine St	Between Lexington Ave and Santa Monica Blvd	Commercial/Hotel	71.8	71.9	0.0	No
Vine St	Between Selma Ave and Sunset Blvd	Residential/ Commercial	71.6	71.7	0.1	No
Vine St	Between Willoughby Ave and Melrose Ave	Commercial/Motel	71.3	71.3	0.0	No
Vine St	Between Yucca St and Hollywood Blvd	Commercial/ Educational	71.1	71.1	0.0	No
Vine St	South of Melrose Ave	Residential/ Religious	71.1	71.1	0.1	No
Vine St/Dix St	East of Argyle Ave	Freeway Underpass	56.9	56.9	0.0	No
Vine St/Dix St	West of Argyle Ave	Commercial/Hotel	57.8	57.8	0.0	No
Vine St/ Franklin Ave	Between US-101 SB off-ramp and Yucca St	Commercial/Hotel	65.7	65.7	0.0	No
Wilcox Ave	Between Franklin Ave and Yucca St	Residential/ Commercial	65.7	65.7	0.0	No
Wilcox Ave	Between Hollywood Blvd and Sunset Blvd	Commercial	68.1	68.2	0.0	No
Wilcox Ave	Between Yucca St and Hollywood Blvd	Residential/ Commercial	66.7	66.8	0.0	No
Wilcox Ave	North of Franklin Ave	Residential/ Commercial	64.3	64.3	0.0	No
Wilcox Ave	South of Sunset Blvd	Commercial	66.4	66.4	0.0	No
Willoughby Ave	Between Cahuenga Blvd and Vine St	Commercial/ Educational	65.0	65.0	0.0	No
Willoughby Ave	East of Vine St	Residential	62.2	62.2	0.0	No
Willoughby Ave	West of Cahuenga Blvd	Commercial	66.5	66.5	0.0	No

TABLE IV.I-15
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2040) PLUS PROJECT CONDITIONS

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)			
			Future (2040) (A)	Future + Project (B)	Project Increment[a] (B–A)	Exceed Threshold?
Yucca St	Between Argyle Ave and N Gower St	Residential/ Religious	63.8	64.3	0.5	No
Yucca St	Between Ivar Ave and Vine St	Commercial/ Educational	65.0	65.4	0.4	No
Yucca St	Between N Cahuenga Blvd and Ivar Ave	Residential/ Commercial	63.4	63.8	0.4	No
Yucca St	Between Vine St and Argyle Ave	Residential/ Commercial	65.1	65.6	0.5	No
Yucca St	Between Wilcox Ave and N Cahuenga Blvd	Residential/ Commercial	59.7	59.8	0.0	No
Yucca St	West of Wilcox Ave	Residential	58.2	58.3	0.0	No

[a] Values may not add up exactly due to rounding in the modeling calculations.

[b] Negative value represents a relatively small decrease in traffic as projected in the traffic model, which reflects estimated travel patterns and the estimated traffic volume data, including the Project data that accounts for TNC trips.

SOURCE: ESA, 2020.

(2) Mitigation Measures

The following mitigation measures would reduce potentially significant construction-related noise impacts:

NOI-MM-1: Noise and vibration construction equipment whose specific location on the Project Site may be flexible (e.g., compressors and generators) shall be located away from the nearest off-site sensitive land uses (at least 100 feet away), or natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such equipment towards these land uses.

NOI-MM-2: The Project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices. In addition, no impact pile driving shall be utilized; augured, or drilled piles are permitted. Flexible sound control curtains shall be placed around all drilling apparatuses, drill rigs, and jackhammers when in use.

NOI-MM-3: A construction liaison shall be provided to inform the nearby receptors 1, 3, and 5 through 13 when peak noise and vibration activities are scheduled to occur. Two weeks prior to the commencement of construction at the Project Site, notification shall be provided to these receptor properties that discloses the construction schedule, including the various types of activities and equipment that would be occurring throughout the duration of the construction period.

(3) Level of Significance After Mitigation

Implementation of the Mitigation Measures NOI-MM-1 and NOI-MM-2, as described above, would reduce the Project's on-site construction noise impacts at the off-site noise sensitive receptors, to the extent technically feasible.[43] Measures to reduce the types and numbers of construction equipment were considered. The noise analysis considered the expected types and numbers of construction equipment that would need to be used during the various construction activities and also considered the closest distances the construction activities would need to occur relative to the noise-sensitive uses in order to construct the proposed Project uses and achieve the Project objectives identified in Chapter II, *Project Description*, of this Draft EIR. Given the logarithmic nature of sound and the decibel scale, reducing the types and numbers of construction equipment by a few pieces of equipment would not result in a substantial reduction in noise levels. A 3 dBA reduction in noise requires a halving of the sound energy. Thus, there would be little benefit in terms of the construction noise levels by requiring a reduction in the types and numbers of construction equipment by only a few pieces of equipment. Given that a 3 dBA reduction in noise would require a halving of the construction sound energy, it would not be feasible to construct the proposed Project by substantially reducing the types and number of construction equipment used by half or more without severely impacting the ability to build the proposed Project within a reasonable schedule and the ability to safely and adequately construct the proposed Project buildings and facilities without access to the full range of the needed equipment. Thus, with implementation of technical feasible mitigation, construction noise impacts at noise-sensitive receptors 1, 3, and 5 through 13 would still exceed the significance threshold. Therefore, construction noise impacts associated with on-site noise sources would remain temporarily significant and unavoidable. While construction noise impacts would be temporarily significant and unavoidable, construction noise levels fluctuate throughout a given workday as construction equipment move from one location to another within a project site. When construction equipment would be in use further away from a sensitive receptor location, construction noise levels would be lower than the calculated values provided herein, which assumes construction equipment would be in use nearest to a sensitive receptor location.

Off-site construction noise impacts associated with vehicle and truck travel would be temporarily significant along Yucca Street between Argyle Avenue and N. Gower Street, primarily as a result of trucks exiting US-101 to travel to the Project Site along Haul Route

[43] As provided in LAMC Section 112.05, technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of the equipment.

Option 1. The Project and the Project with the East Site Hotel Option would implement a Construction Traffic Management Plan (refer to Project Design Feature TRAF-PDF-2 in Section IV.L, *Transportation*, of this Draft EIR) that would include street closure information, a detour plan, haul routes and a staging plan, and would be prepared and submitted to the City for review and approval. However, concrete trucks and worker vehicles would not be subject to the City-approved haul route and these trucks and vehicles would travel from a variety of locations, which may include travel along Yucca Street between Argyle Avenue and N. Gower Street. Since there are no feasible mitigation measures to impose restriction for concrete trucks and worker vehicles to travel along this segment, impacts would be temporarily significant and unavoidable. Nevertheless, trucks and vehicles driving past a sensitive receptor location would also generate very short-term (i.e., several seconds) fluctuating noise levels as a truck and/or vehicle passes the location. Exposure to fluctuating construction noise levels that would at times be lower than the noise levels shown in the analysis above would not rise to the level that would result in hearing loss,[44] and the significant construction noise increase on a Project-specific basis would not be expected to result in adverse health impacts.

Operational noise impacts would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (b): Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?

Construction activities, including excavation depths, building footprint and construction methods, would be essentially the same under the Project and the Project with the East Site Hotel Option. Accordingly, construction impacts would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the construction impact analysis presented within the analyses below are the same and apply to the Project and the Project with the East Site Hotel Option.

Also, the Project and the Project with the East Site Hotel Option would have essentially the same ground level operational design features and characteristics, such that there would be no material change to the operational vibration analyses of the Project or the Project with the East Site Hotel Option. Accordingly, operational impacts discussed in the analyses below would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the impact analysis, impact significance, and mitigation measures presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

[44] United States Department of Labor, Occupational Safety and Health Administration. Occupational Safety and Health Standards Part 1910, Standard 1910.95.

(1) Impact Analysis

(a) Construction

(i) Structural Damage

Construction activities can generate varying degrees of ground vibration, depending on the construction procedures and the type of construction equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of the construction site often varies, depending on soil type, ground strata, and construction characteristics of the receptor buildings.

With regard to potential building damage, the Project would generate groundborne construction vibration forces during building demolition and site excavation/grading activities when heavy construction equipment, such as large bulldozers, drill rigs, and loaded trucks, would be used. The FTA has published standard vibration velocities levels for various construction equipment operations. **Table IV.I-16**, *Construction Equipment Vibration Levels*, presents the typical vibration levels at a reference distance of 25 feet for construction equipment anticipated to be used during Project construction. Vibration impacts with regard to structures are evaluated at the nearest off-site buildings to the Project Site (north, south, east, and west) and the on-site Capitol Records Complex (i.e., Capitol Records Building and Gogerty Building) as indicated previously in Table IV.I-4, whereas the potential for human annoyance associated with construction-related vibration are evaluated at the receptors 1 through 13.

TABLE IV.I-16
CONSTRUCTION EQUIPMENT VIBRATION LEVELS

Equipment	Equipment vibration Levels at 25 Feet, (PPV / VdB)
Vibratory Roller	0.210 / 94
Large Bulldozer	0.089 / 87
Caisson Drilling	0.089 / 87
Loaded Trucks (e.g., haul trucks)	0.076 / 86
Jackhammer	0.035 / 79
Small Bulldozer	0.003 / 58

SOURCE: FTA, *Transit Noise and Vibration Impact Assessment Manual*, Table 7-4.

Table IV.I-17, *Construction Vibration Impacts – Building Damage*, provides the estimated vibration levels (in terms of inch per second PPV) at the nearest off-site structures (including adjacent historic structures) to the Project Site. As indicated in Table IV.I-17, the estimated vibration velocity levels from all construction equipment would be below the

building damage significance criteria at off-site building structures west and east of the West Site and East Site construction areas. The estimated vibration levels at the buildings adjacent to the north and south of the West Site and East Site construction areas would be up to 3.379 inch/second PPV, which would exceed the 0.50 inch/second PPV significance threshold (FTA Category I, Reinforced concrete, steel, or timber building) at the AMDA Vine building and the Argyle House at the southwest corner of Yucca/Argyle and the 0.12 inch/second PPV significance threshold (FTA Category IV, Buildings extremely susceptible to building damage) at the Avalon Hollywood and the Pantages Theatre. The estimated vibration levels from the Project construction activities at both the West Site and East Site would exceed the significance threshold of 0.50 inch/second PPV significance threshold (FTA Category I, Reinforced-concrete, steel or timber) at the Capitol Records Building and Gogerty Building. The estimated vibration levels from construction activities at both the West Site and East Site would exceed the significance threshold, as applicable to adjacent historic buildings, of 0.12 inch/second PPV significance threshold (FTA Category IV, Buildings extremely susceptible to building damage) at the Art Deco Building Storefront on the West Site and the Pantages Theatre and Avalon Hollywood on the East Site.[45] The estimated vibration levels from construction activities at the East Site would exceed the significance threshold of 0.20 inch/second PPV significance threshold (FTA Category III, Non-engineered timber and masonry buildings) at the single-story commercial building at 1718 N. Vine Street located south of the East Site.

As it relates to potential damages to adjacent buildings from construction, the Project or the Project with the East Site Hotel Option would be subject to Section 91.3307 of the LAMC (Protection of Adjoining Property). Specifically, Section 91.3307.1 (Protection Required) states adjoining public and private property would be protected from damage during construction, remodeling and demolition work.

Nonetheless, on-site vibration impacts, pursuant to the significance criteria for building damage, during construction of the Project or the Project with the East Site Hotel Option would be potentially significant. See the Mitigation Measures subsection below for feasible mitigation that may lessen but not reduce impacts to a less-than-significant level.

[45] See Section IV.C, *Cultural Resources*, of this Draft EIR.

TABLE IV.I-17
CONSTRUCTION VIBRATION IMPACTS – BUILDING DAMAGE

Nearest Off-Site Building Structures[a]	Estimated Vibration Velocity Levels at the Nearest Off-Site Structures from the Project Construction Equipment,[b] inch/second (PPV)						Significance Threshold, dBA (L_{eq})	Significant Impacts?
	Vibratory Roller	Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small Bulldozer		
West Site								
North – 6. AMDA Vine building[f]	3.379	1.432	1.432	1.223	0.563	0.048	0.50[e]	**Yes**
North – 14. Art Deco Building at 6314–24 Yucca Street[f]	3.379	1.432	1.432	1.223	0.563	0.048	0.12[c]	**Yes**
South – 15. Avalon Hollywood[f]	3.379	1.432	1.432	1.223	0.563	0.048	0.12[c]	**Yes**
East – 18 and 19. Capitol Records Complex (located on-site within the Project East Site)	0.028	0.012	0.012	0.010	0.005	0.000	0.50[e]	No
West – 16 and 17. Single-story commercial buildings on west side of Ivar Avenue	0.040	0.017	0.017	0.015	0.007	0.001	0.20[d]	No
East Site								
North – 3. Argyle House at southwest corner of Yucca/Argyle[f]	3.379	1.432	1.432	1.223	0.563	0.048	0.50[e]	**Yes**
South – 9. Pantages Theatre[f]	3.379	1.432	1.432	1.223	0.563	0.048	0.12[c]	**Yes**
South – 20. Single-story commercial building at 1718 N. Vine Street	3.379	1.432	1.432	1.223	0.563	0.048	0.20[d]	**Yes**
East – 8. Eastown Residential building	0.040	0.017	0.017	0.015	0.007	0.001	0.50[e]	No
West – 11. h Club LA	0.028	0.012	0.012	0.010	0.005	0.000	0.20	No
West – 15. Avalon Hollywood[f]	3.379	1.432	1.432	1.223	0.563	0.048	0.12[c]	**Yes**
Historic Structures								
9. Pantages Theatre[f]	3.379	1.432	1.432	1.223	0.563	0.048	0.12[c]	**Yes**

TABLE IV.I-17
CONSTRUCTION VIBRATION IMPACTS – BUILDING DAMAGE

Nearest Off-Site Building Structures[a]	Estimated Vibration Velocity Levels at the Nearest Off-Site Structures from the Project Construction Equipment,[b] inch/second (PPV)						Significance Threshold, dBA (L_{eq})	Significant Impacts?
	Vibratory Roller	Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small Bulldozer		
10. The Lofts (Hollywood Equitable Building)	0.045	0.019	0.019	0.016	0.008	0.001	0.12[c]	No
13. St. Elmo Apartments at 6358 Yucca Street	0.016	0.007	0.007	0.006	0.003	0.000	0.12[c]	No
14. Art Deco Building at 6314-24 Yucca Street[f]	3.379	1.432	1.432	1.223	0.563	0.048	0.12[c]	**Yes**
15. Avalon Hollywood[f]	3.379	1.432	1.432	1.223	0.563	0.048	0.12[c]	**Yes**
17. Hollywood-Ivar Building at 1741 Ivar Avenue	0.040	0.017	0.017	0.015	0.007	0.001	0.12[c]	No
18. Capitol Records Building[f] (on-site within the Project East Site)	3.379	1.432	1.432	1.223	0.563	0.048	0.50[e]	**Yes**
19. Gogerty Building (located on-site within the Project East Site)	0.575	0.244	0.244	0.208	0.096	0.008	0.50[e]	**Yes**

[a] Represents off-site building structures located nearest to the Project Site to the north, south, east and west.

[b] Vibration level calculated based on FTA reference vibration level at 25-foot distance.

[c] FTA criteria buildings extremely susceptible to building damage. Significance threshold for the Hollywood Equitable Building is conservative as it is a concrete building, which would have higher vibration limits.

[d] FTA criteria for non-engineered timber and masonry buildings.

[e] FTA criteria for reinforced concrete, steel or timber buildings.

[f] The Project construction activities would be up to the property line adjacent to the buildings. Vibration levels at the property line are best estimate as the FTA reference data are at 25 feet distance and FTA calculation procedure is generally applicable to distances greater than 25 feet.

SOURCE: AES, Construction Noise & Vibration Impact Study, March 2020. Provided in Appendix K-1 of this Draft EIR.

(ii) Human Annoyance

Table IV.I-18, *Construction Vibration Impacts – Human Annoyance (West Site)*, and **Table IV.I-19**, *Construction Vibration Impacts – Human Annoyance (East Site)*, present the estimated vibration levels (in terms of inch per second VdB) due to construction equipment at off-site vibration receptors; for construction activities at the West Site and East Site, respectively. As indicated in Table IV.I-18, the estimated vibration levels due to on-site construction equipment at the West Site would exceed the significance threshold for human annoyance at receptors 6 and 11 through 13 but not at receptors 1 through 5 and 7 through 10. As indicated in Table IV.I-19, the estimated vibration levels due to construction equipment at the East Site would exceed the vibration significance threshold for human annoyance at receptors 3, 5, and 8 through 11 but not at receptors 1, 2, 4, 6, 7, 12, and 13. **Therefore, the on-site vibration impacts pursuant to the significance criteria for human annoyance during construction of the Project or the Project with the East Site Hotel Option would be potentially significant.**

(b) Operation

Day-to-day operation would include the use of typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce vibration at low levels and would not cause vibration impacts to the off-site environment. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the proposed parking areas. According to the FTA, if the roadway is fairly smooth, the vibration from rubber-tired traffic is rarely perceptible, with the threshold of perception for humans at approximately 65 VdB.[46] The Project's parking areas would be paved with smooth and maintained surfaces, and vehicles would be traveling at very low speeds minimizing vibration levels. Parking area vibration would also be confined to the immediate area and would not be expected to be perceptible off the Project Site. Therefore, parking area vibration would not exceed the significance threshold of 72 dBA at off-site sensitive uses, including residential and theatre uses and 75 VdB at off-site institutional uses. According to America Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE), pumps or compressor would generate groundborne vibration levels of 0.5 in/sec PPV at 1 foot.[47] At 25 feet, this vibration level drops to approximately 0.004 in/sec PPV at 25 feet (approximately 60 VdB), which is below the threshold of 72 dBA at off-site sensitive uses, including residential and theatre uses and 75 VdB at off-site institutional uses.[48] It is anticipated that Project mechanical equipment, including air handling units, condenser units, and exhaust fans, would be located on building rooftops. Therefore, groundborne vibration from the operation of such mechanical equipment would not impact any of the off-site sensitive receptors. **Therefore, vibration impacts from Project operation would be less than significant for the Project and the Project with the East Site Hotel Option.**

46 FTA, *Transit Noise and Vibration Impact Assessment Manual*, 2018, pages 112 and 113.

47 America Society of Heating, Refrigerating and Air-Conditioning Engineers, Inc., *Heating, Ventilating, and Air-Conditioning Applications*, 1999.

48 FTA, *Transit Noise and Vibration Impact Assessment Manual*, 2018, pages 111, 184 and 185.

TABLE IV.I-18
CONSTRUCTION VIBRATION IMPACTS – HUMAN ANNOYANCE (WEST SITE)

Off-Site Receptor Location	Estimated Vibration Velocity Levels at the Nearest Off-Site Structures from the Project Construction Equipment,[a] VdB						Significance Threshold, dBA (L_{eq})	Potentially Significant Impacts?
	Vibratory Roller	Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small Bulldozer		
1	69	62	62	61	54	33	72	No
2	59	52	52	51	44	23	72	No
3	62	55	55	54	47	26	72	No
4	54	47	47	46	39	18	72	No
5	54	47	47	46	39	18	72	No
6	**119**	**112**	**112**	**111**	**104**	**83**	75	Yes
7	73	66	66	65	58	37	75	No
8	54	47	47	46	39	18	72	No
9	63	56	56	55	48	27	72	No
10	63	56	56	55	48	27	72	No
11	**76**	69	69	68	61	40	72	Yes
12	**77**	70	70	69	62	41	72	Yes
13	**72**	65	65	64	57	36	72	Yes

[a] Vibration level calculated based on FTA reference vibration level at 25-foot distance.

Bold-faced represents vibration levels exceeded the significance threshold.

SOURCE: FTA, Transit Noise and Vibration Impact Assessment Manual, Table 7-4; AES, Construction Noise & Vibration Impact Study, March 2020. Provided in Appendix K-1 of this Draft EIR.

TABLE IV.I-19
CONSTRUCTION VIBRATION IMPACTS – HUMAN ANNOYANCE (EAST SITE)

Off-Site Receptor Location	Estimated Vibration Velocity Levels at the Nearest Off-Site Structures from the Project Construction Equipment,[a] VdB						Significance Threshold, dBA (Leq)	Potentially Significant Impacts?
	Vibratory Roller	Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small Bulldozer		
1	60	53	53	52	45	24	72	No
2	63	56	56	55	48	27	72	No
3	**119**	**112**	**112**	**111**	**104**	**83**	72	**Yes**
4	65	58	58	57	50	29	72	No
5	**79**	**72**	**72**	71	64	43	72	**Yes**
6	66	59	59	58	51	30	75	No
7	62	55	55	54	47	26	75	No
8	**79**	**72**	**72**	71	64	43	72	**Yes**
9	**119**	**112**	**112**	**111**	**104**	**83**	72	**Yes**
10	**76**	69	69	68	61	40	72	**Yes**
11	**77**	70	70	69	62	41	72	**Yes**
12	62	55	55	54	47	26	72	No
13	52	45	45	44	37	16	72	No

[a] Vibration level calculated based on FTA reference vibration level at 25-foot distance.

Bold-faced represents vibration levels exceeded the significance threshold.

SOURCE: FTA, Transit Noise and Vibration Impact Assessment Manual, Table 7-4; AES, Construction Noise & Vibration Impact Study, March 2020. Provided in Appendix K-1 of this Draft EIR.

(2) Mitigation Measures

The following mitigation measures would reduce potentially significant impacts regarding structural vibration damage:

NOI-MM-4: The Applicant shall perform structural vibration monitoring during Project construction as follows:

a. Prior to start of construction, the Applicant shall retain the services of a licensed building inspector or structural engineer, or other qualified professional as approved by the City, to visit the following buildings, which are located adjacent to the Project Site and to the west, to inspect and document (video and/or photographic) the apparent physical condition of the building's readily-visible features. This includes both historic buildings and non-historic buildings in proximity to the Project Site. For the historic buildings listed below, inspection and documentation shall also be carried out by and in coordination with a qualified preservation consultant. The non-historic buildings are as follows:

   - AMDA Vine Building
   - Argyle House
   - Single-story commercial building at 1718 N. Vine Street (if this building has already been demolished as part of Related Project No. 2, the provisions of this mitigation measure do not apply to this structure).

   The historic buildings are as follows:

   - Capitol Records Building (on-site)
   - Gogerty Building (on-site)
   - Pantages Theatre (off-site)
   - Avalon Hollywood (off-site)
   - 6316-24 Yucca Street/Art Deco Building Storefront (off-site)

b. The Applicant shall retain the services of a qualified acoustical engineer and/or structural engineer to develop and implement a vibration monitoring program during the site demolition and grading/excavation, capable of documenting the construction-related ground vibration levels at the buildings listed above. The vibration monitoring systems shall be placed at receptor building façades closest to Project construction activity or placed at a representative location if a receptor building façade is not accessible and shall continuously measure (in vertical and horizontal directions) and store the peak particle velocity (PPV) in inch/second. The systems shall also be programmed for two preset velocity levels: a warning level of 0.10 inch/second (PPV) for the off-site historic structures, 0.15 inch/second (PPV) for the single-story commercial building at 1718 N. Vine Street (not required if this building has already been demolished as part of Related Project No. 2), and 0.45 inch/second (PPV) for the Capitol

Records Building, Gogerty Building, AMDA Vine Building and the Argyle House and a regulatory level of 0.12 inch/second (PPV) for the off-site historic structures, 0.2 inch/second (PPV) for the single-story commercial building at 1718 N. Vine Street (not required if this building has already been demolished as part of Related Project No. 2), and 0.50 inch/second (PPV) for the Capitol Records Building, Gogerty Building, AMDA Vine Building and the Argyle House. In cases where a receptor building façade is not accessible, the two preset velocity levels shall be programmed at equivalent levels based on distance and soil characteristics that affect vibration transmission over that distance. The systems shall also provide real-time alert when the vibration levels exceed the two preset levels.

c. The vibration monitoring program shall be submitted, for review and approval to the Department of Building and Safety, prior to initiating any construction activities.

d. In the event the warning level (i.e., 0.10, 0.15, and 0.45 inch/second [PPV], or equivalent levels) is triggered, the contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level, including but not limited to staggering concurrent vibration-generating construction activities (if doing so would not pose a safety risk to personnel or damage risk to buildings or facilities) and utilizing lower vibratory techniques.

e. In the event the regulatory level (i.e., 0.12, 0.20, and 0.50 inch/second [PPV], or equivalent levels) is triggered, the contractor shall identify the source of vibration generation and implement feasible steps identified in Item “d” above to reduce the vibration level from construction activities to avoid or minimize damage from construction activities in the vicinity of the building. The contractor shall visually inspect the building for any damage. Results of the inspection must be logged.

f. In the event that the regulatory ground vibration levels are exceeded and there is documented evidence including a visual inspection that no damage to historic structures has occurred, the ground vibration levels can be increased to the criteria for the previous building structural category in increments as follows, subject to review and approval by the City, up to a maximum regulatory ground vibration level of 0.5 inch/second (PPV), or equivalent level.

   - From Category IV to Category III (0.12 to 0.2 inch/second [PPV], or equivalent level),
   - From Category III to Category II (0.2 to 0.3 inch/second [PPV], or equivalent level), or
   - From Category II to Category I (0.3 to 0.5 inch/second [PPV], or equivalent level).

   If the regulatory ground vibration level is increased, the warning level shall also be increased matching the corresponding Category as follows (or equivalent levels):

   - Category I: 0.45 inch/second [PPV]

- Category II: 0.25 inch/second [PPV]
- Category III: 0.15 inch/second [PPV]
- Category IV: 0.10 inch/second [PPV]

g. If new regulatory and warning levels are set pursuant to Item "f" above, they can be exceeded and increased again pursuant to the same requirements in Item "f".

h. In the event damage occurs to the historic buildings (finish materials) due to construction vibration, such materials shall be repaired in consultation with a qualified preservation consultant, and, if warranted, in a manner that meets the Secretary of the Interior's Standards.

Operational vibration impacts would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

(3) Level of Significance After Mitigation

With implementation of mitigation measures, structural vibration impacts would be reduced to less-than-significant levels for the Capitol Records Building and Gogerty Building. However, while implementation of Mitigation Measure NOI-MM-4 would provide the same or similar protections to the other buildings subject to potential structural damage from vibration which would reduce impacts to less-than-significant levels, because Mitigation Measure NOI-MM-4 requires the consent of other property owners, who may not agree, it is conservatively concluded that structural vibration impacts on the AMDA Vine Building, the Argyle House at southwest corner of Yucca Street and Argyle Avenue, the Pantages Theatre, Avalon Hollywood, Art Deco Building (6320 Yucca), and the single-story commercial building at 1718 N. Vine Street (except if this building has already been demolished as part of Related Project No. 2) would be significant and unavoidable because it cannot be assured that all components of Mitigation Measure NOI-MM-4 can be implemented.

Vibration impacts regarding human annoyance at the nearby noise sensitive receptors would exceed the significance thresholds (72 VdB at residential uses and 75 VdB at institutional uses). Potential mitigation measures to reduce vibration impacts from on-site construction activities with respect to human annoyance include the installation of a wave barrier, which is typically a trench or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier to reduce noise). However, wave barriers must be very deep and long to be effective and are not considered feasible for temporary applications, such as the Project construction.[49] Per the Caltrans Transportation and Construction Vibration Guidance Manual, the wave barrier would need to be at least two-thirds of the seismic wavelength and the length of the barrier must be at least one wavelength (typical wavelength can be up to 500 feet). In addition, constructing a wave barrier to reduce the Project's construction-related vibration impacts would, in and of

[49] Caltrans, *Transportation and Construction Vibration Guidance Manual*, September 2013.

itself, generate groundborne vibration from the excavation equipment. Thus, it is concluded that there are no feasible mitigation measures that could be implemented to reduce the temporary vibration impacts from on-site construction associated with human annoyance at the vibration-sensitive receptors 3, 5, 6, and 8 through 13. **Therefore, Project-level vibration impacts from on-site construction activities with respect to human annoyance would be significant and unavoidable for the Project and the Project with the East Site Hotel Option.**

Operational vibration impacts would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (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?

As discussed in Subsection VI.6, *Impacts Found not to be Significant*, and in the Initial Study (Appendix A) of this Draft EIR, the nearest airport is the Hollywood Burbank Airport located approximately 6.5 miles north of the Project Site. **Therefore, the Project and the Project with the East Site Hotel Option would not expose people residing or working in the Project Site area to excessive noise levels for a project within the vicinity of a public use airport or private airstrip, and no impact would occur with respect to Threshold (c). As such, no further analysis is required.**

e) Cumulative Impacts

Construction activities would be essentially the same under the Project and the Project with the East Site Hotel Option. Accordingly, cumulative construction impacts would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding cumulative construction impacts presented within the analyses below are the same and apply to the Project and the Project with the East Site Hotel Option.

During operations, the Project and the Project with the East Site Hotel Option would generate different operational traffic volumes. Therefore, cumulative roadway noise impacts were evaluated for both the Project and the Project with the East Site Hotel Option. However, conclusions regarding the operational traffic noise mitigation measures and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

Also, operational noise sources would be essentially the same under the Project and the Project with the East Site Hotel Option. Accordingly, cumulative stationary source noise impacts would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the cumulative stationary source

impact analysis, mitigation measures, and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

(1) Impact Analysis

(a) Construction

(i) On-Site Construction Noise

The potential for cumulative construction noise impacts from on-site construction activities to occur is based on the distance between the Project and each of the related projects. Noise from construction activities would normally affect the areas immediately adjacent to each of the construction sites, specifically areas that are less than 500 feet from a construction site (500 feet is the distance identified in the 2006 L.A. CEQA Thresholds Guide as the Screening Criterion with respect to construction activities). That is, cumulative noise impacts could occur at receptor locations that are within 500 feet from two different construction sites. Therefore, based on the 500-foot Screening Criterion distance, the cumulative construction noise impacts analysis is limited to related projects within 1,000 feet of the Project Site. The 1,000-foot distance is based on an assumption that a noise-sensitive receptor would be located halfway between the Project Site and the related project.

As discussed in Chapter III, *Environmental Setting*, of this Draft EIR, there are 150 related projects identified in the vicinity of the Project Site (123 related projects in the City of Los Angeles and 27 related projects within the City of West Hollywood). Ten development projects are situated within 1,000 feet from the Project Site:

- Related Project No.1 – Argyle House (built)
- Related Project No. 2 – Hotel at 1718 N. Vine Street
- Related Project No.3 – Kimpton Everly Hotel (built)
- Related Project No.4 – Residential uses at 6220 W. Yucca Street
- Related Project No.5 – Offices at 6225 W. Hollywood Boulevard[50]
- Related Project No. 6 – Mixed Use Development at 6200 W. Hollywood Boulevard
- Related Project No. 7 – Hotel at 6381 W. Hollywood Boulevard
- Related Project No. 8 – Condominiums and Hotel at 6140 Hollywood Boulevard
- Related Project No. 9 – Offices at 1601 N. Vine Street (built)
- Related Project No. 10 – Residential uses at 6100 W. Hollywood Boulevard

[50] Related Project No. 5, located at 6225 Hollywood Boulevard, was terminated by the Department of City Planning via a Notice of Termination on December 31, 2012. This related project will be quantitatively evaluated in the Draft EIR to be conservative for analyses regarding noise and vibration.

Noise from on-site construction activities are localized and would normally affect the areas within 500 feet of the individual construction sites. All 13 of the nearby noise-sensitive receptor locations (refer to Figure IV.I-3) would be subject to cumulative noise impacts. Related Projects No. 1, 3, 6, and 9 have been completed and are not considered in the cumulative construction analysis.

Related Projects 2, 4, 5, 7, 8, and 10 are closest to noise-sensitive receptors 1, 3, and 5 through 13 identified for this noise analysis. If construction of any of these related projects were to overlap with construction of the Project, cumulative construction noise level increases could occur at the sensitive receptor locations. At the time of preparation of this Draft EIR, no noise studies identifying potential construction scheduling or noise impacts for these projects have been submitted to the City, with the exception of Related Project No. 2. Therefore, a quantitative analysis assuming a construction overlap and/or a combined construction noise level would be entirely speculative with the exception of Related Project No. 2. According to the Draft EIR for Related Project No. 2, construction noise levels after mitigation would exceed the significance thresholds and would result in cumulative construction noise impacts if nearby related projects, including the Project, were to be constructed concurrently.[51] Based on a qualitative assessment for the other related projects listed above, and to present a conservative worst-case analysis, it is assumed that Related Projects 4, 5, 7, 8, and 10 are in close enough proximity that their individual or combined short-term construction noise levels would have a potentially significant cumulative impact on noise-sensitive receptors 1, 3, and 5 through 13, even with implementation of feasible mitigation measures by these respective related projects. **Accordingly, given the significant construction noise impacts on receptors 1, 3, and 5 through 13 under both the Project and the Project with the East Site Hotel Option, if construction of one or more of these related projects were to overlap with Project construction, the Project's contribution to cumulative construction noise would be cumulatively considerable and would represent a significant cumulative impact for the Project and the Project with the East Site Hotel Option.**

(ii) Off-Site Construction Noise

If construction of related projects would overlap with Project construction and construction trucks would utilize the same roadway network as the Project, cumulative off-site construction noise level increases could occur in the Project area. The exact construction scheduling and timing of construction truck trips for the identified related projects are not known. Therefore, a quantitative analysis assuming a construction overlap and/or a combined on-road construction noise level would be entirely speculative. Nonetheless, based on a qualitative assessment, and to present a worst-case analysis, it is assumed that construction truck trips from related projects could result in increases in noise levels combined with the Project that would result in cumulative impacts on sensitive receptors along the roadway network. As shown in Table IV.I-11, Project construction would result in significant increases in traffic noise during construction along Yucca Street between

[51] City of Los Angeles, *Draft Environmental Impact Report, citizenM Hollywood & Vine Project*, Section IV.H, Noise, ENV-2016-2846-EIR, June 2019.

Argyle Avenue and Gower Street. When combined with construction truck trips from related projects, it is possible that the combined increases in noise levels from Project and related project construction truck trips would also exceed the significance threshold. Each project applicant would be required to prepare and submit to LADOT for approval a construction management plan that would be based on the nature and timing of the specific construction and other projects in the vicinity of the development site. **Nonetheless, should construction overlap with related project construction, the Project and the Project with the East Site Hotel Option's contribution to cumulative construction noise would be cumulatively considerable and would represent a significant cumulative impact along common travel routes.**

(iii) Groundborne Vibration

Due to rapid attenuation characteristics of groundborne vibration, only related projects located adjacent to the same sensitive receptors would result in cumulatively considerable vibration impacts. The only related projects that are located adjacent to the same receptor as the Project are Related Project No. 1 and Related Project No. 2. However, Related Project No. 1 is already built, and, therefore, it would not contribute to cumulative vibration impacts. Should construction of the Project and Related Project No. 2 overlap, there is the potential for cumulative vibration impacts to the Pantages Theatre to the south of the Project Site. As discussed above, construction of the Project would result in significant vibration impacts related to structural damage and human annoyance at this receptor. **Therefore, vibration impacts in association with Related Project No. 2 would be cumulatively considerable, and cumulative impacts due to construction vibration would be significant for the Project and the Project with the East Site Hotel Option. Because consent of off-site property owners, who may not agree, would be required to implement Mitigation Measure NOI-MM-4, it is conservatively concluded that cumulative vibration impacts on the Pantages Theatre would be significant and unavoidable because it cannot be assured that all components of Mitigation Measure NOI-MM-4 can be implemented.**

(b) Operations

(i) Cumulative Impacts Under Future (2027) Traffic Conditions

Cumulative off-site noise impacts would occur primarily as a result of increased traffic on local roadways due to operation of the Project and the related projects as traffic is the greatest source of operational noise in the Project area. Cumulative off-site traffic-generated noise impacts were assessed based on a comparison of the noise levels generated by the future cumulative Project traffic volumes to the noise levels generated by the existing base traffic volumes. The future cumulative with Project traffic volumes represent an estimate of the ambient background growth, related projects traffic, and the Project volumes. Therefore, the cumulative increase represents the increase in traffic volumes attributed to ambient background growth, related project traffic, and the Project traffic volumes over existing conditions.

The results of that comparison are provided in **Table IV.I-20**, *Off-Site Traffic Noise Impacts – Future (2027) Project Cumulative Increment*. The traffic noise levels in the table are the same as would occur under Future (2027) cumulative plus Project with the East Site Hotel Option conditions; thus, the noise levels shown are applicable to the Project with the East Site Hotel Option. The maximum cumulative noise increase where there are sensitive receptors from the Project plus related project traffic and ambient background growth would be 11.9 dBA CNEL (from approximately 39.6 to 51.4 dBA CNEL[52]), which would occur along Franklin Avenue west of N. Highland Avenue in an area with residential uses. This increase in sound level would exceed the 2006 L.A. CEQA Thresholds Guide significance criteria of an increase of more than 5 dBA CNEL since the Future with Project noise levels would be in the "normally acceptable" category for residential uses. However, as shown previously in Table IV.I-14, the Project's contribution to the Future (Year 2027) Plus Project noise levels on this segment would be 0.0 dBA CNEL. The Project would not contribute to the cumulative noise levels. Furthermore, the Project's lack of contribution along this segment would not be the determining factor of a cumulative increase of more than 5 dBA – in other words, the noise levels from the related projects would cause a cumulative increase of more than 5 dBA without or with implementation of the Project. Therefore, the perceived noise levels at sensitive land uses along Franklin Avenue west of N. Highland Avenue with buildout of the related projects would be similar whether or not the Project is implemented. For this reason, the Project's incremental contributions to cumulative noise impacts would not be cumulatively considerable along this roadway segment, and cumulative impacts would be less than significant.

TABLE IV.I-20
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2027) PLUS PROJECT CUMULATIVE INCREMENT

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)				
			Existing (A)	Future + Project (B)	Cumulative Increment[a] (B–A)	Project Increment	Exceed Threshold?
Argyle Ave	Between Franklin Ave and US-101 SB on-ramp	Commercial	65.3	67.1	1.7	0.2	No
Argyle Ave	Between Hollywood Blvd and Selma Ave	Residential/ Commercial	64.2	67.0	2.8	0.1	No
Argyle Ave	Between US-101 SB on-ramp and Yucca St	Residential/ Commercial	63.6	66.0	2.4	0.1	No
Argyle Ave	Between Selma Ave and Sunset Blvd	Residential/ Commercial	65.8	67.5	1.7	0.2	No

52 The difference of 11.9 dBA CNEL is due to rounding in the modeling calculations.

TABLE IV.I-20
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2027) PLUS PROJECT CUMULATIVE INCREMENT

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)				
			Existing (A)	Future + Project (B)	Cumulative Increment[a] (B–A)	Project Increment	Exceed Threshold?
Argyle Ave	Between Vine St/Dix St and Franklin Ave	Commercial	62.4	62.9	0.5	0.0	No
Argyle Ave	Between Yucca St and Hollywood Blvd	Residential/ Commercial	65.0	67.4	2.4	0.5	No
Argyle Ave	North of Vine St/ Dix St	Residential	56.3	56.7	0.3	0.2	No
Beachwood Dr	North of Franklin Ave	Residential/ Educational	64.3	64.5	0.2	0.0	No
Beachwood Dr	South of Franklin Ave	Commercial/ Motel	56.5	56.6	0.1	0.0	No
Bronson Ave	Between Hollywood Blvd and Sunset Blvd	Residential/ Commercial	65.4	66.1	0.8	0.0	No
Bronson Ave	Between Franklin Ave and Hollywood Blvd	Residential/ Commercial	65.7	66.7	1.0	0.0	No
Bronson Ave	North of Franklin Ave	Residential/ Commercial	62.9	63.1	0.2	0.0	No
Bronson Ave	South of Sunset Blvd	Residential/ Commercial/ Educational	66.8	67.4	0.6	0.0	No
Cahuenga Blvd	Between Hollywood and Selma Ave	Commercial	68.3	69.8	1.4	0.0	No
Cahuenga Blvd	Between Sunset and De Longpre Ave	Commercial	67.8	69.5	1.6	0.0	No
Cahuenga Blvd	Between De Longpre Ave and Fountain Ave	Residential/ Commercial	69.0	70.4	1.3	0.0	No
Cahuenga Blvd	Between Fountain Ave and Santa Monica	Residential/ Commercial/ Educational	68.8	70.4	1.6	0.1	No

TABLE IV.I-20
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2027) PLUS PROJECT CUMULATIVE INCREMENT

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)				
			Existing (A)	Future + Project (B)	Cumulative Increment[a] (B–A)	Project Increment	Exceed Threshold?
Cahuenga Blvd	Between Santa Monica and Willoughby Ave	Commercial/ Educational	69.4	70.5	1.2	0.1	No
Cahuenga Blvd	Between Franklin Ave and Yucca St	Commercial/ Motel	68.2	69.4	1.2	0.1	No
Cahuenga Blvd	Between US-101 NB off-ramp and US-101 SB off-ramp	Freeway Underpass	68.4	69.7	1.3	0.0	No
Cahuenga Blvd	Between US-101 SB off-ramp and US-101 SB on-ramp	Freeway Underpass	68.7	70.0	1.4	0.0	No
Cahuenga Blvd	Between US-101 SB on-ramp and Franklin Ave	Commercial	70.4	71.7	1.3	0.1	No
Cahuenga Blvd	Between Selma Ave and Sunset Blvd	Commercial	66.0	67.3	1.3	0.1	No
Cahuenga Blvd	Between Yucca St and Hollywood Blvd	Commercial	67.2	69.0	1.8	0.1	No
Cahuenga Blvd	North of US-101 NB off-ramp	Residential/ Hotel	69.1	70.3	1.2	0.0	No
Cahuenga Blvd	Between Willoughby Ave and Melrose Ave	Commercial	69.0	70.2	1.2	0.0	No
Cahuenga Blvd	South of Melrose Ave	Residential	60.5	63.8	3.3	0.2	Yes
Camrose Dr/ Milner Rd	East of N Highland Ave	Residential	55.4	57.2	1.8	0.0	No
Camrose Dr/ Milner Rd	West of N Highland Ave	Residential	58.6	58.8	0.1	0.0	No
Carlos Ave	East of N Gower St	Residential/ Religious	55.0	55.2	0.2	0.0	No

TABLE IV.I-20
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2027) PLUS PROJECT CUMULATIVE INCREMENT

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)				
			Existing (A)	Future + Project (B)	Cumulative Increment[a] (B–A)	Project Increment	Exceed Threshold?
Carlos Ave	West of N Gower St	Residential	54.0	54.1	0.1	0.0	No
Cole Ave	Between Fountain Ave and Santa Monica Blvd	Commercial	59.0	59.2	0.2	0.0	No
Cole Ave	North of Fountain Ave	Commercial	57.9	58.1	0.2	0.0	No
Cole Ave	South of Santa Monica Blvd	Commercial	61.7	61.9	0.2	0.0	No
De Longpre Ave	Between Cahuenga Blvd and Vine St	Commercial	60.6	63.3	2.6	0.0	No
De Longpre Ave	East of Vine St	Commercial	59.6	61.2	1.6	0.0	No
De Longpre Ave	West of Cahuenga Blvd	Commercial	61.9	62.7	0.8	0.0	No
Fountain Ave	Between Cahuenga Blvd and Vine St	Commercial	67.2	67.9	0.7	0.1	No
Fountain Ave	Between Cole Ave and Cahuenga Blvd	Residential	65.1	66.1	1.0	0.1	No
Fountain Ave	Between Vine St and El Centro Ave	Residential/ Commercial	66.9	67.6	0.7	0.1	No
Fountain Ave	East of El Centro Ave	Residential	66.7	67.2	0.6	0.1	No
Fountain Ave	West of Cole Ave	Residential/ Commercial	66.7	67.6	0.9	0.1	No
Franklin Ave	Between Argyle Ave and N Gower St	Residential/ Commercial	71.8	72.4	0.6	0.1	No
Franklin Ave	Between N Beachwood Dr and Bronson Ave	Commercial/ Educational/ Hotel/ Residential	72.2	72.7	0.6	0.1	No

TABLE IV.I-20
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2027) PLUS PROJECT CUMULATIVE INCREMENT

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)				
			Existing (A)	Future + Project (B)	Cumulative Increment[a] (B–A)	Project Increment	Exceed Threshold?
Franklin Ave	Between N Cahuenga Blvd and Vine St	Residential/ Commercial	64.5	65.3	0.8	0.1	No
Franklin Ave	Between N Gower St and N Beachwood Dr	Residential/ Commercial	72.0	72.6	0.6	0.1	No
Franklin Ave	Between N Highland Ave and Wilcox Ave	Residential/ Commercial	66.4	67.0	0.6	0.1	No
Franklin Ave	Between N La Brea Ave and Highland Ave	Residential/ Educational/ Open Space	70.4	70.6	0.2	0.0	No
Franklin Ave	Between Wilcox Ave and N Cahuenga Blvd	Commercial	67.0	67.8	0.8	0.1	No
Franklin Ave	East of Bronson Ave	Residential/ Commercial	72.3	72.8	0.5	0.1	No
Franklin Ave	East of Highland Ave	Residential/ Religious	51.1	51.9	0.7	0.0	No
Franklin Ave	West of N Highland Ave	Residential	39.6	51.4	11.9	0.0	Yes
Franklin Ave	West of N La Brea Ave	Residential	62.2	62.5	0.4	0.1	No
Fuller Ave	North of Hollywood Blvd	Residential/ Commercial	61.3	61.5	0.2	0.0	No
Fuller Ave	South of Hollywood Blvd	Residential	60.0	60.1	0.2	0.0	No
Gower St	Between Carlos Ave and Hollywood Blvd	Residential/ Commercial	68.1	69.8	1.7	0.1	No
Gower St	Between Franklin Ave and US-101 NB off-ramp	Commercial/ Hotel	67.6	68.8	1.2	0.0	No

TABLE IV.I-20
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2027) PLUS PROJECT CUMULATIVE INCREMENT

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)				
			Existing (A)	Future + Project (B)	Cumulative Increment[a] (B–A)	Project Increment	Exceed Threshold?
Gower St	Between US-101 NB off-ramp and US-101 SB off-ramp/Yucca St	Religious/Open Space	68.5	69.7	1.2	0.0	No
Gower St	Between US-101 SB off-ramp/Yucca St and Yucca St	Religious/Open Space	66.5	67.1	0.6	0.1	No
Gower St	Between Selma Ave and Sunset Blvd	Residential/ Commercial	67.6	69.0	1.4	0.0	No
Gower St	Between Yucca St and Carlos Ave	Residential/ Religious/ Educational	66.5	67.4	0.9	0.1	No
Gower St	North of Franklin Ave	Residential	68.3	69.7	1.4	0.1	No
Gower St	Between Hollywood Blvd and Selma Ave	Residential/ Commercial	68.4	69.6	1.2	0.0	No
Gower St	South of Sunset Blvd	Residential/ Commercial	60.2	60.5	0.2	0.1	No
Hawthorne Ave	East of N La Brea Ave	Residential/ Educational/ Hotel	61.4	61.5	0.1	0.0	No
Hawthorne Ave	West of N La Brea Ave	Residential/ Commercial	53.5	53.6	0.1	0.0	No
Highland Ave	Between Franklin Ave and Hollywood Blvd	Residential/ Commercial	72.9	73.8	0.9	0.0	No
Highland Ave	Between Hollywood Blvd and Selma Ave	Commercial/ Educational	73.1	73.8	0.7	0.0	No
Highland Ave	Between Camrose Dr/ Milner Rd and Franklin Ave	Commercial/ Hotel	70.5	71.7	1.2	0.0	No
Highland Ave	Between Franklin Ave and Franklin Ave	Commercial	69.8	71.2	1.3	0.0	No

TABLE IV.I-20
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2027) PLUS PROJECT CUMULATIVE INCREMENT

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)				
			Existing (A)	Future + Project (B)	Cumulative Increment[a] (B–A)	Project Increment	Exceed Threshold?
Highland Ave	Between Selma Ave and Sunset Blvd	Commercial/ Educational	70.1	71.2	1.1	0.0	No
Highland Ave	North of Camrose Dr/ Milner Rd	Residential/ Open Space	73.2	74.0	0.8	0.0	No
Highland Ave	South of Sunset Blvd	Residential/ Commercial	70.0	71.1	1.1	0.0	No
Hollywood Blvd	Between Argyle Ave and Gower St	Residential/ Commercial	69.4	71.5	2.1	0.2	No
Hollywood Blvd	Between Cahuenga Blvd and Ivar Ave	Commercial	68.7	70.8	2.1	0.2	No
Hollywood Blvd	Between Gower St and N Bronson Ave	Commercial/ Hotel/Religious	69.5	72.0	2.5	0.1	No
Hollywood Blvd	Between Highland Ave and Wilcox Ave	Commercial	68.8	70.3	1.5	0.1	No
Hollywood Blvd	Between US-101 SB ramps and US-101 NB ramps/Van Ness Ave	Freeway Overpass	68.9	70.9	2.0	0.2	No
Hollywood Blvd	Between Ivar Ave and Vine St	Commercial/ Hotel	69.6	72.0	2.4	0.1	No
Hollywood Blvd	Between N Bronson Ave and US-101 SB ramps	Commercial	70.6	71.7	1.0	0.0	No
Hollywood Blvd	Between N Fuller Ave and N La Brea Ave	Residential/ Commercial/ Religious	68.3	70.1	1.8	0.1	No
Hollywood Blvd	Between N La Brea Ave and Orange Dr	Commercial	68.2	70.0	1.9	0.1	No

TABLE IV.I-20
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2027) PLUS PROJECT CUMULATIVE INCREMENT

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)				
			Existing (A)	Future + Project (B)	Cumulative Increment[a] (B–A)	Project Increment	Exceed Threshold?
Hollywood Blvd	Between Orange Dr and Highland Ave	Commercial/ Hotel	70.5	72.2	1.8	0.1	No
Hollywood Blvd	Between Vine St and Argyle Ave	Commercial	69.2	71.3	2.1	0.2	No
Hollywood Blvd	Between Wilcox Ave and Cahuenga Blvd	Commercial/ Medical	69.1	70.9	1.8	0.1	No
Hollywood Blvd	East of US-101 NB ramps/Van Ness Ave	Commercial	70.7	72.1	1.5	0.1	No
Hollywood Blvd	West of N Fuller Ave	Residential	72.2	73.3	1.1	0.0	No
Ivar Ave	Between Hollywood Blvd and Selma Ave	Residential/ Commercial/ Library	63.1	64.3	1.2	0.6	No
Ivar Ave	Between Selma Ave and Sunset Blvd	Commercial/ Educational	64.0	65.0	1.0	0.5	No
Ivar Ave	Between Yucca St and Hollywood Blvd	Residential/ Commercial	63.4	64.1	0.7	0.5	No
Ivar Ave	North of Yucca St	Residential	55.6	55.8	0.2	0.0	No
Ivar Ave	South of Sunset Blvd	Commercial	64.0	64.8	0.8	0.4	No
La Brea Ave	Between Franklin Ave and Hollywood Blvd	Residential/ Commercial/ Religious/ Educational	70.6	70.8	0.2	0.0	No
La Brea Ave	Between Hollywood Blvd and Hawthorne Ave	Residential/ Commercial	69.7	70.2	0.5	0.0	No
La Brea Ave	North of Franklin Ave	Residential	59.8	59.9	0.1	0.0	No
La Brea Ave	South of Hawthorne Ave	Residential/ Commercial	70.4	70.8	0.4	0.0	No

TABLE IV.I-20
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2027) PLUS PROJECT CUMULATIVE INCREMENT

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)				
			Existing (A)	Future + Project (B)	Cumulative Increment[a] (B–A)	Project Increment	Exceed Threshold?
Lexington Ave	East of Vine St	Residential/ Commercial	59.8	60.5	0.8	0.0	No
Lexington Ave	West of Vine St	Residential/ Educational	60.8	61.2	0.5	0.0	No
Melrose Ave	Between Cahuenga Blvd and Vine St	Commercial	71.5	72.0	0.5	0.0	No
Melrose Ave	East of Vine St	Commercial/ Senior Care	71.8	72.3	0.6	0.0	No
Melrose Ave	West of Cahuenga Blvd	Residential/ Commercial	73.0	73.4	0.4	0.0	No
Orange Dr	North of Hollywood Blvd	Residential	61.1	61.3	0.1	0.0	No
Orange Dr	South of Hollywood Blvd	Commercial/ Hotel	60.1	60.2	0.1	0.0	No
Santa Monica Blvd	Between Cahuenga Blvd and Vine St	Commercial	70.8	72.2	1.4	0.0	No
Santa Monica Blvd	Between Cole Ave and Cahuenga Blvd	Commercial/ Open Space	70.8	72.2	1.4	0.0	No
Santa Monica Blvd	Between Vine St and El Centro Ave	Commercial	70.8	72.2	1.4	0.0	No
Santa Monica Blvd	East of El Centro Ave	Commercial	70.9	72.3	1.4	0.0	No
Santa Monica Blvd	West of Cole Ave	Commercial	72.2	73.7	1.4	0.0	No
Selma Ave	Between Argyle Ave and N Gower St	Commercial/ Hotel	62.8	65.8	3.0	0.0	No
Selma Ave	Between Ivar Ave and Vine St	Residential/ Commercial	62.8	64.8	1.9	0.0	No
Selma Ave	Between N Cahuenga Blvd and Ivar Ave	Commercial	62.9	64.9	2.0	0.1	No

TABLE IV.I-20
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2027) PLUS PROJECT CUMULATIVE INCREMENT

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)				
			Existing (A)	Future + Project (B)	Cumulative Increment[a] (B–A)	Project Increment	Exceed Threshold?
Selma Ave	Between N Highland Ave and N Cahuenga Blvd	Commercial/ Educational/ Religious	61.5	63.9	2.4	0.1	No
Selma Ave	Between Vine St and Argyle Ave	Residential/ Commercial	64.7	67.2	2.5	0.0	No
Selma Ave	East of N Gower St	Residential	51.6	51.7	0.1	0.0	No
Sunset Blvd	Between Argyle Ave and Gower St	Commercial	71.6	73.6	2.0	0.0	No
Sunset Blvd	Between Cahuenga Blvd and Ivar Ave	Commercial	71.1	73.1	2.0	0.0	No
Sunset Blvd	Between Gower St and Bronson Ave	Commercial/ Hotel	71.6	73.8	2.1	0.0	No
Sunset Blvd	Between Ivar Ave and Vine St	Commercial/ Educational	71.3	73.2	1.9	0.0	No
Sunset Blvd	Between N Highland Ave and Wilcox Ave	Commercial/ Educational/ Religious	71.2	72.9	1.8	0.0	No
Sunset Blvd	Between Vine St and Argyle Ave	Commercial	71.8	73.7	1.9	0.0	No
Sunset Blvd	Between Wilcox Ave and Cahuenga Blvd	Commercial	71.4	73.3	1.9	0.0	No
Sunset Blvd	East of Bronson Ave	Residential/ Commercial	72.0	74.1	2.1	0.1	No
Sunset Blvd	West of N Highland Ave	Commercial/ Educational/ Motel	72.8	74.2	1.4	0.0	No
US-101 NB off-ramp	Off-ramp East of N Cahuenga Blvd	Freeway Ramp	62.0	62.5	0.4	0.0	No
US-101 NB off-ramp	Off-ramp East of N Gower St	Freeway Ramp	61.0	62.4	1.4	0.1	No

TABLE IV.I-20
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2027) PLUS PROJECT CUMULATIVE INCREMENT

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)				
			Existing (A)	Future + Project (B)	Cumulative Increment[a] (B–A)	Project Increment	Exceed Threshold?
US-101 NB ramps/Van Ness Ave	Ramps/Van Ness Ave North of Hollywood Blvd	Freeway Ramp	67.7	68.2	0.6	0.0	No
US-101 NB ramps/Van Ness Ave	Ramps/Van Ness Ave South of Hollywood Blvd	Freeway Ramp	63.7	66.2	2.6	0.3	No
US-101 SB off-ramp	Off-ramp Between Vine St/Franklin Ave and Argyle Ave	Freeway Ramp	72.3	73.3	1.0	0.1	No
US-101 SB off-ramp	Off-ramp West of N Cahuenga Blvd	Freeway Ramp	68.2	68.9	0.8	0.0	No
US-101 SB off-ramp/ Yucca St	Off-ramp/Yucca St East of N Gower St	Freeway Ramp	55.1	55.3	0.2	0.0	No
US-101 SB off-ramp/ Yucca St	Off-ramp/Yucca St West of N Gower St	Freeway Ramp	63.3	64.5	1.2	0.0	No
US-101 SB on-ramp	On-ramp East of Argyle Ave	Freeway Ramp	60.7	62.3	1.6	0.2	No
US-101 SB on-ramp	On-ramp East of N Cahuenga Blvd	Freeway Ramp	58.9	60.2	1.3	0.0	No
US-101 SB ramps	Ramps north of Hollywood Blvd	Freeway Ramp	65.1	65.7	0.6	-0.2[b]	No
US-101 SB ramps	Ramps south of Hollywood Blvd	Freeway Ramp	60.8	64.7	3.9	0.1	No
Vine St	Between Fountain Ave and Lexington Ave	Commercial	70.6	71.7	1.1	0.0	No
Vine St	Between Hollywood Blvd and Selma Ave	Residential/ Commercial/ Hotel	70.6	71.5	0.8	0.1	No
Vine St	Between Santa Monica Blvd and Willoughby Ave	Commercial/ Educational	70.6	71.3	0.7	0.0	No

TABLE IV.I-20
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2027) PLUS PROJECT CUMULATIVE INCREMENT

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)				
			Existing (A)	Future + Project (B)	Cumulative Increment[a] (B–A)	Project Increment	Exceed Threshold?
Vine St	Between Sunset Blvd and De Longpre Ave	Residential/ Commercial	70.8	72.1	1.3	0.1	No
Vine St	Between De Longpre Ave and Fountain Ave	Commercial	70.8	71.9	1.1	0.0	No
Vine St	Between Lexington Ave and Santa Monica Blvd	Commercial/ Hotel	70.7	71.7	1.1	0.0	No
Vine St	Between Selma Ave and Sunset Blvd	Residential/ Commercial	70.5	71.5	1.0	0.1	No
Vine St	Between Willoughby Ave and Melrose Ave	Commercial/ Motel	70.5	71.2	0.7	0.0	No
Vine St	Between Yucca St and Hollywood Blvd	Commercial/ Educational	70.3	70.9	0.7	0.0	No
Vine St	South of Melrose Ave	Residential/ Religious	70.2	70.9	0.8	0.1	No
Vine St/ Dix St	East of Argyle Ave	Freeway Underpass	56.6	56.7	0.2	0.0	No
Vine St/ Dix St	West of Argyle Ave	Commercial/ Hotel	57.4	57.6	0.1	0.0	No
Vine St/ Franklin Ave	Between US-101 SB off-ramp and Yucca St	Commercial/ Hotel	64.7	65.5	0.8	0.0	No
Wilcox Ave	Between Franklin Ave and Yucca St	Residential/ Commercial	65.0	65.5	0.5	0.0	No
Wilcox Ave	Between Hollywood Blvd and Sunset Blvd	Commercial	65.9	68.0	2.2	0.0	No
Wilcox Ave	Between Yucca St and Hollywood Blvd	Residential/ Commercial	65.8	66.6	0.8	0.0	No

TABLE IV.I-20
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2027) PLUS PROJECT CUMULATIVE INCREMENT

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)				
			Existing (A)	Future + Project (B)	Cumulative Increment[a] (B–A)	Project Increment	Exceed Threshold?
Wilcox Ave	North of Franklin Ave	Residential/ Commercial	63.4	64.1	0.8	0.0	No
Wilcox Ave	South of Sunset Blvd	Commercial	65.6	66.2	0.6	0.0	No
Willoughby Ave	Between Cahuenga Blvd and Vine St	Commercial/ Educational	64.6	64.8	0.1	0.0	No
Willoughby Ave	East of Vine St	Residential	61.9	62.0	0.2	0.0	No
Willoughby Ave	West of Cahuenga Blvd	Commercial	66.2	66.3	0.2	0.0	No
Yucca St	Between Argyle Ave and N Gower St	Residential/ Religious	61.4	64.1	2.8	0.5	No
Yucca St	Between Ivar Ave and Vine St	Commercial/ Educational	64.5	65.3	0.8	0.4	No
Yucca St	Between N Cahuenga Blvd and Ivar Ave	Residential/ Commercial	62.8	63.7	0.9	0.5	No
Yucca St	Between Vine St and Argyle Ave	Residential/ Commercial	64.0	65.4	1.4	0.5	No
Yucca St	Between Wilcox Ave and N Cahuenga Blvd	Residential/ Commercial	59.1	59.6	0.5	0.0	No
Yucca St	West of Wilcox Ave	Residential	57.9	58.0	0.2	0.0	No

[a] Values may not add up exactly due to rounding in the modeling calculations.

[b] Negative value represents a relatively small decrease in traffic as projected in the traffic model, which reflects estimated travel patterns and the estimated traffic volume data, including the Project data that accounts for TNC trips.

SOURCE: ESA, 2020.

Cumulative noise levels would increase 3.3 dBA CNEL (from 60.5 to 63.8 dBA CNEL) at Cahuenga Boulevard south of Melrose Avenue. The noise level increase would not exceed the 5 dBA significance threshold for the "conditionally acceptable" category for residential uses. As shown in Table IV.I-14, the Project's contribution to the Future (Year 2027) Plus Project noise levels would be 0.2 dBA CNEL. The Project's contribution to the

cumulative noise levels would be substantially below the 3 dBA change in ambient noise levels that would be perceptible.

As shown in Table IV.I-20, no other roadway segments, aside from Franklin Avenue west of N. Highland Avenue as discussed above, would have a cumulative increase of more than 5 dBA for areas normally or conditionally acceptable or a cumulative increase of more than 3 dBA for areas normally unacceptable or clearly unacceptable.

Although there would be a cumulative impact along one roadway segment with residential uses, the Project and the Project with the East Site Hotel Option's contribution would not be cumulatively considerable under future year 2027 conditions. Accordingly, cumulative impacts would be less than significant for the Project and the Project with the East Site Hotel Option.

(ii) Cumulative Impacts Under Future (2040) Traffic Conditions

Cumulative off-site noise impacts would occur primarily as a result of increased traffic on local roadways due to operation of the Project and the related projects, as traffic is the greatest source of operational noise in the Project area. Cumulative off-site traffic-generated noise impacts were assessed based on a comparison of the noise levels generated by the future cumulative Project traffic volumes to the noise levels generated by the existing base traffic volumes. The future cumulative with Project traffic volumes represent an estimate of the ambient background growth, related projects traffic, and the Project volumes. Therefore, the cumulative increase represents the increase in traffic volumes attributed to ambient background growth, related project traffic, and the Project traffic volumes over existing conditions.

The results of that comparison are provided in **Table IV.I-21**, *Off-Site Traffic Noise Impacts – Future (2040) Project Cumulative Increment*. The traffic noise levels in the table are the same as would occur under Future (2040) cumulative plus Project with the East Site Hotel Option conditions; thus, the noise levels shown are applicable to the Project with the East Site Hotel Option. The maximum cumulative noise increase where there are sensitive receptors from the Project plus related project traffic and ambient background growth would be 11.9 dBA CNEL (from approximately 39.6 to 51.4 dBA CNEL[53]), which would occur along Franklin Avenue west of N. Highland Avenue in an area with residential uses. This increase in sound level would exceed the 2006 L.A. CEQA Thresholds Guide significance criteria of an increase of more than 5 dBA CNEL since the Future with Project noise levels would be in the "normally acceptable" category for residential uses. However, as shown in Table IV.I-15, the Project's contribution to the Future (Year 2040) Plus Project noise levels on this segment would be 0.0 dBA CNEL. The Project would not contribute to the cumulative noise levels. Furthermore, the Project's lack of contribution along this segment would not be the determining factor of a cumulative increase of more than 5 dBA – in other words, the noise levels from the related projects would cause a cumulative increase of more

53 The difference of 11.9 dBA CNEL is due to rounding in the modeling calculations.

than 5 dBA without or with implementation of the Project. Therefore, the perceived noise levels at sensitive land uses along Franklin Avenue west of N. Highland Avenue with buildout of the related projects would be similar whether or not the Project is implemented. For this reason, the Project's incremental contributions to cumulative noise impacts would not be cumulatively considerable along this roadway segment.

TABLE IV.I-21
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2040) PLUS PROJECT CUMULATIVE INCREMENT

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)				
			Existing (A)	Future + Project (B)	Cumulative Increment[a] (B–A)	Project Increment	Exceed Threshold?
Argyle Ave	Between Franklin Ave and US-101 SB on-ramp	Commercial	65.3	67.2	1.9	0.2	No
Argyle Ave	Between Hollywood Blvd and Selma Ave	Residential/ Commercial	64.2	67.1	2.9	0.1	No
Argyle Ave	Between US-101 SB on-ramp and Yucca St	Residential/ Commercial	63.6	66.1	2.5	0.1	No
Argyle Ave	Between Selma Ave and Sunset Blvd	Residential/ Commercial	65.8	67.7	1.8	0.2	No
Argyle Ave	Between Vine St/Dix St and Franklin Ave	Commercial	62.4	63.1	0.7	0.0	No
Argyle Ave	Between Yucca St and Hollywood Blvd	Residential/ Commercial	65.0	67.5	2.5	0.5	No
Argyle Ave	North of Vine St/Dix St	Residential	56.3	56.9	0.6	0.1	No
Beachwood Dr	North of Franklin Ave	Residential/ Educational	64.3	64.7	0.4	0.0	No
Beachwood Dr	South of Franklin Ave	Commercial/ Motel	56.5	56.9	0.4	0.0	No
Bronson Ave	Between Hollywood Blvd and Sunset Blvd	Residential/ Commercial	65.4	66.3	1.0	0.0	No

TABLE IV.I-21
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2040) PLUS PROJECT CUMULATIVE INCREMENT

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)				
			Existing (A)	Future + Project (B)	Cumulative Increment[a] (B–A)	Project Increment	Exceed Threshold?
Bronson Ave	Between Franklin Ave and Hollywood Blvd	Residential/ Commercial	65.7	66.9	1.2	0.0	No
Bronson Ave	North of Franklin Ave	Residential/ Commercial	62.9	63.3	0.4	0.0	No
Bronson Ave	South of Sunset Blvd	Residential/ Commercial/ Educational	66.8	67.6	0.8	0.0	No
Cahuenga Blvd	Between Hollywood and Selma Ave	Commercial	68.3	69.9	1.6	0.0	No
Cahuenga Blvd	Between Sunset and De Longpre Ave	Commercial	67.8	69.6	1.8	0.0	No
Cahuenga Blvd	Between De Longpre Ave and Fountain Ave	Residential/ Commercial	69.0	70.5	1.5	0.0	No
Cahuenga Blvd	Between Fountain Ave and Santa Monica	Residential/ Commercial/ Educational	68.8	70.5	1.7	0.1	No
Cahuenga Blvd	Between Santa Monica and Willoughby Ave	Commercial/ Educational	69.4	70.7	1.3	0.1	No
Cahuenga Blvd	Between Franklin Ave and Yucca St	Commercial/ Motel	68.2	69.6	1.4	0.1	No
Cahuenga Blvd	Between US-101 NB off-ramp and US-101 SB off-ramp	Freeway Underpass	68.4	69.9	1.5	0.0	No
Cahuenga Blvd	Between US-101 SB off-ramp and US-101 SB on-ramp	Freeway Underpass	68.7	70.2	1.5	0.0	No

TABLE IV.I-21
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2040) PLUS PROJECT CUMULATIVE INCREMENT

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)				
			Existing (A)	Future + Project (B)	Cumulative Increment[a] (B–A)	Project Increment	Exceed Threshold?
Cahuenga Blvd	Between US-101 SB on-ramp and Franklin Ave	Commercial	70.4	71.8	1.4	0.1	No
Cahuenga Blvd	Between Selma Ave and Sunset Blvd	Commercial	66.0	67.5	1.5	0.1	No
Cahuenga Blvd	Between Yucca St and Hollywood Blvd	Commercial	67.2	69.2	2.0	0.1	No
Cahuenga Blvd	North of US-101 NB off-ramp	Residential/Hotel	69.1	70.4	1.4	0.0	No
Cahuenga Blvd	Between Willoughby Ave and Melrose Ave	Commercial	69.0	70.4	1.4	0.0	No
Cahuenga Blvd	South of Melrose Ave	Residential	60.5	63.9	3.4	0.2	Yes
Camrose Dr/ Milner Rd	East of N Highland Ave	Residential	55.4	57.3	1.9	0.0	No
Camrose Dr/ Milner Rd	West of N Highland Ave	Residential	58.6	59.0	0.4	0.0	No
Carlos Ave	East of N Gower St	Residential/ Religious	55.0	55.4	0.3	0.0	No
Carlos Ave	West of N Gower St	Residential	54.0	54.4	0.4	0.0	No
Cole Ave	Between Fountain Ave and Santa Monica Blvd	Commercial	59.0	59.5	0.4	0.0	No
Cole Ave	North of Fountain Ave	Commercial	57.9	58.3	0.4	0.0	No
Cole Ave	South of Santa Monica Blvd	Commercial	61.7	62.1	0.4	0.0	No
De Longpre Ave	Between Cahuenga Blvd and Vine St	Commercial	60.6	63.4	2.8	0.0	No

TABLE IV.I-21
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2040) PLUS PROJECT CUMULATIVE INCREMENT

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)				
			Existing (A)	Future + Project (B)	Cumulative Increment[a] (B–A)	Project Increment	Exceed Threshold?
De Longpre Ave	East of Vine St	Commercial	59.6	61.4	1.8	0.0	No
De Longpre Ave	West of Cahuenga Blvd	Commercial	61.9	62.9	1.0	0.0	No
Fountain Ave	Between Cahuenga Blvd and Vine St	Commercial	67.2	68.1	0.9	0.1	No
Fountain Ave	Between Cole Ave and Cahuenga Blvd	Residential	65.1	66.3	1.2	0.1	No
Fountain Ave	Between Vine St and El Centro Ave	Residential/ Commercial	66.9	67.8	0.9	0.1	No
Fountain Ave	East of El Centro Ave	Residential	66.7	67.4	0.8	0.1	No
Fountain Ave	West of Cole Ave	Residential/ Commercial	66.7	67.8	1.1	0.1	No
Franklin Ave	Between Argyle Ave and N Gower St	Residential/ Commercial	71.8	72.6	0.8	0.1	No
Franklin Ave	Between N Beachwood Dr and Bronson Ave	Commercial/ Educational/ Hotel/Residential	72.2	72.9	0.7	0.1	No
Franklin Ave	Between N Cahuenga Blvd and Vine St	Residential/ Commercial	64.5	65.5	1.0	0.1	No
Franklin Ave	Between N Gower St and N Beachwood Dr	Residential/ Commercial	72.0	72.8	0.8	0.1	No
Franklin Ave	Between N Highland Ave and Wilcox Ave	Residential/ Commercial	66.4	67.2	0.8	0.1	No
Franklin Ave	Between N La Brea Ave and Highland Ave	Residential/ Educational/ Open Space	70.4	70.8	0.4	0.0	No
Franklin Ave	Between Wilcox Ave and N Cahuenga Blvd	Commercial	67.0	68.0	1.0	0.1	No

TABLE IV.I-21
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2040) PLUS PROJECT CUMULATIVE INCREMENT

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)				
			Existing (A)	Future + Project (B)	Cumulative Increment[a] (B–A)	Project Increment	Exceed Threshold?
Franklin Ave	East of Bronson Ave	Residential/ Commercial	72.3	73.0	0.7	0.1	No
Franklin Ave	East of Highland Ave	Residential/ Religious	51.1	52.1	0.9	0.0	No
Franklin Ave	West of N Highland Ave	Residential	39.6	51.4	11.9	0.0	Yes
Franklin Ave	West of N La Brea Ave	Residential	62.2	62.7	0.6	0.1	No
Fuller Ave	North of Hollywood Blvd	Residential/ Commercial	61.3	61.7	0.4	0.0	No
Fuller Ave	South of Hollywood Blvd	Residential	60.0	60.3	0.4	0.0	No
Gower St	Between Carlos Ave and Hollywood Blvd	Residential/ Commercial	68.1	70.0	1.8	0.1	No
Gower St	Between Franklin Ave and US-101 NB off-ramp	Commercial/ Hotel	67.6	69.0	1.4	0.0	No
Gower St	Between US-101 NB off-ramp and US-101 SB off-ramp/Yucca St	Religious/Open Space	68.5	69.8	1.4	0.0	No
Gower St	Between US-101 SB off-ramp/Yucca St and Yucca St	Religious/Open Space	66.5	67.3	0.8	0.1	No
Gower St	Between Selma Ave and Sunset Blvd	Residential/ Commercial	67.6	69.1	1.5	0.0	No
Gower St	Between Yucca St and Carlos Ave	Residential/ Religious/ Educational	66.5	67.6	1.1	0.1	No
Gower St	North of Franklin Ave	Residential	68.3	69.8	1.5	0.1	No
Gower St	Between Hollywood Blvd and Selma Ave	Residential/ Commercial	68.4	69.7	1.4	0.0	No

TABLE IV.I-21
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2040) PLUS PROJECT CUMULATIVE INCREMENT

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)				
			Existing (A)	Future + Project (B)	Cumulative Increment[a] (B–A)	Project Increment	Exceed Threshold?
Gower St	South of Sunset Blvd	Residential/ Commercial	60.2	60.7	0.4	0.0	No
Hawthorne Ave	East of N La Brea Ave	Residential/ Educational/ Hotel	61.4	61.8	0.4	0.0	No
Hawthorne Ave	West of N La Brea Ave	Residential/ Commercial	53.5	53.8	0.3	0.0	No
Highland Ave	Between Franklin Ave and Hollywood Blvd	Residential/ Commercial	72.9	74.0	1.1	0.0	No
Highland Ave	Between Hollywood Blvd and Selma Ave	Commercial/ Educational	73.1	74.0	0.9	0.0	No
Highland Ave	Between Camrose Dr/ Milner Rd and Franklin Ave	Commercial/ Hotel	70.5	71.9	1.3	0.0	No
Highland Ave	Between Franklin Ave and Franklin Ave	Commercial	69.8	71.3	1.5	0.0	No
Highland Ave	Between Selma Ave and Sunset Blvd	Commercial/ Educational	70.1	71.3	1.2	0.0	No
Highland Ave	North of Camrose Dr/ Milner Rd	Residential/Open Space	73.2	74.2	1.0	0.0	No
Highland Ave	South of Sunset Blvd	Residential/ Commercial	70.0	71.3	1.3	0.0	No
Hollywood Blvd	Between Argyle Ave and Gower St	Residential/ Commercial	69.4	71.7	2.3	0.2	No
Hollywood Blvd	Between Cahuenga Blvd and Ivar Ave	Commercial	68.7	70.9	2.2	0.2	No
Hollywood Blvd	Between Gower St and N Bronson Ave	Commercial/ Hotel/ Religious	69.5	72.1	2.6	0.1	No

TABLE IV.I-21
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2040) PLUS PROJECT CUMULATIVE INCREMENT

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)				
			Existing (A)	Future + Project (B)	Cumulative Increment[a] (B–A)	Project Increment	Exceed Threshold?
Hollywood Blvd	Between Highland Ave and Wilcox Ave	Commercial	68.8	70.4	1.6	0.1	No
Hollywood Blvd	Between US-101 SB ramps and US-101 NB ramps/Van Ness Ave	Freeway Overpass	68.9	71.0	2.1	0.2	No
Hollywood Blvd	Between Ivar Ave and Vine St	Commercial/ Hotel	69.6	72.2	2.5	0.1	No
Hollywood Blvd	Between N Bronson Ave and US-101 SB ramps	Commercial	70.6	71.8	1.2	0.0	No
Hollywood Blvd	Between N Fuller Ave and N La Brea Ave	Residential/ Commercial/ Religious	68.3	70.2	2.0	0.1	No
Hollywood Blvd	Between N La Brea Ave and Orange Dr	Commercial	68.2	70.2	2.0	0.1	No
Hollywood Blvd	Between Orange Dr and Highland Ave	Commercial/ Hotel	70.5	72.4	1.9	0.1	No
Hollywood Blvd	Between Vine St and Argyle Ave	Commercial	69.2	71.4	2.2	0.2	No
Hollywood Blvd	Between Wilcox Ave and Cahuenga Blvd	Commercial/ Medical	69.1	71.0	1.9	0.1	No
Hollywood Blvd	East of US-101 NB ramps/Van Ness Ave	Commercial	70.7	72.3	1.6	0.1	No
Hollywood Blvd	West of N Fuller Ave	Residential	72.2	73.4	1.3	0.0	No
Ivar Ave	Between Hollywood Blvd and Selma Ave	Residential/ Commercial/ Library	63.1	64.5	1.4	0.6	No

TABLE IV.I-21
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2040) PLUS PROJECT CUMULATIVE INCREMENT

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)				
			Existing (A)	Future + Project (B)	Cumulative Increment[a] (B–A)	Project Increment	Exceed Threshold?
Ivar Ave	Between Selma Ave and Sunset Blvd	Commercial/ Educational	64.0	65.2	1.2	0.5	No
Ivar Ave	Between Yucca St and Hollywood Blvd	Residential/ Commercial	63.4	64.2	0.9	0.5	No
Ivar Ave	North of Yucca St	Residential	55.6	56.0	0.4	0.0	No
Ivar Ave	South of Sunset Blvd	Commercial	64.0	65.0	1.0	0.4	No
La Brea Ave	Between Franklin Ave and Hollywood Blvd	Residential/ Commercial/ Religious/ Educational	70.6	71.0	0.4	0.0	No
La Brea Ave	Between Hollywood Blvd and Hawthorne Ave	Residential/ Commercial	69.7	70.4	0.7	0.0	No
La Brea Ave	North of Franklin Ave	Residential	59.8	60.1	0.4	0.0	No
La Brea Ave	South of Hawthorne Ave	Residential/ Commercial	70.4	71.0	0.6	0.0	No
Lexington Ave	East of Vine St	Residential/ Commercial	59.8	60.7	1.0	0.0	No
Lexington Ave	West of Vine St	Residential/ Educational	60.8	61.4	0.7	0.0	No
Melrose Ave	Between Cahuenga Blvd and Vine St	Commercial	71.5	72.2	0.7	0.0	No
Melrose Ave	East of Vine St	Commercial/ Senior Care	71.8	72.5	0.8	0.0	No
Melrose Ave	West of Cahuenga Blvd	Residential/ Commercial	73.0	73.6	0.6	0.0	No
Orange Dr	North of Hollywood Blvd	Residential	61.1	61.5	0.4	0.0	No
Orange Dr	South of Hollywood Blvd	Commercial/ Hotel	60.1	60.5	0.4	0.0	No

TABLE IV.I-21
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2040) PLUS PROJECT CUMULATIVE INCREMENT

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)				
			Existing (A)	Future + Project (B)	Cumulative Increment[a] (B–A)	Project Increment	Exceed Threshold?
Santa Monica Blvd	Between Cahuenga Blvd and Vine St	Commercial	70.8	72.4	1.5	0.0	No
Santa Monica Blvd	Between Cole Ave and Cahuenga Blvd	Commercial/ Open Space	70.8	72.4	1.6	0.0	No
Santa Monica Blvd	Between Vine St and El Centro Ave	Commercial	70.8	72.4	1.6	0.0	No
Santa Monica Blvd	East of El Centro Ave	Commercial	70.9	72.5	1.6	0.0	No
Santa Monica Blvd	West of Cole Ave	Commercial	72.2	73.8	1.6	0.0	No
Selma Ave	Between Argyle Ave and N Gower St	Commercial/ Hotel	62.8	65.9	3.1	0.0	No
Selma Ave	Between Ivar Ave and Vine St	Residential/ Commercial	62.8	64.9	2.1	0.0	No
Selma Ave	Between N Cahuenga Blvd and Ivar Ave	Commercial	62.9	65.0	2.1	0.1	No
Selma Ave	Between N Highland Ave and N Cahuenga Blvd	Commercial/ Educational/ Religious	61.5	64.0	2.5	0.1	No
Selma Ave	Between Vine St and Argyle Ave	Residential/ Commercial	64.7	67.3	2.6	0.0	No
Selma Ave	East of N Gower St	Residential	51.6	51.9	0.3	0.0	No
Sunset Blvd	Between Argyle Ave and Gower St	Commercial	71.6	73.8	2.2	0.0	No
Sunset Blvd	Between Cahuenga Blvd and Ivar Ave	Commercial	71.1	73.2	2.1	0.0	No

TABLE IV.I-21
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2040) PLUS PROJECT CUMULATIVE INCREMENT

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)				
			Existing (A)	Future + Project (B)	Cumulative Increment[a] (B–A)	Project Increment	Exceed Threshold?
Sunset Blvd	Between Gower St and Bronson Ave	Commercial/ Hotel	71.6	73.9	2.3	0.0	No
Sunset Blvd	Between Ivar Ave and Vine St	Commercial/ Educational	71.3	73.3	2.1	0.0	No
Sunset Blvd	Between N Highland Ave and Wilcox Ave	Commercial/ Educational/ Religious	71.2	73.1	1.9	0.0	No
Sunset Blvd	Between Vine St and Argyle Ave	Commercial	71.8	73.8	2.0	0.0	No
Sunset Blvd	Between Wilcox Ave and Cahuenga Blvd	Commercial	71.4	73.5	2.1	0.0	No
Sunset Blvd	East of Bronson Ave	Residential/ Commercial	72.0	74.2	2.2	0.1	No
Sunset Blvd	West of N Highland Ave	Commercial/ Educational/ Motel	72.8	74.3	1.6	0.0	No
US-101 NB off-ramp	Off-ramp East of N Cahuenga Blvd	Freeway Ramp	62.0	62.7	0.6	0.0	No
US-101 NB off-ramp	Off-ramp East of N Gower St	Freeway Ramp	61.0	62.5	1.5	0.1	No
US-101 NB ramps/Van Ness Ave	Ramps/Van Ness Ave North of Hollywood Blvd	Freeway Ramp	67.7	68.4	0.8	0.0	No
US-101 NB ramps/Van Ness Ave	Ramps/Van Ness Ave South of Hollywood Blvd	Freeway Ramp	63.7	66.4	2.7	0.3	No
US-101 SB off-ramp	Off-ramp Between Vine St/Franklin Ave and Argyle Ave	Freeway Ramp	72.3	73.5	1.2	0.1	No
US-101 SB off-ramp	Off-ramp West of N Cahuenga Blvd	Freeway Ramp	68.2	69.1	0.9	0.0	No

TABLE IV.I-21
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2040) PLUS PROJECT CUMULATIVE INCREMENT

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)				
			Existing (A)	Future + Project (B)	Cumulative Increment[a] (B–A)	Project Increment	Exceed Threshold?
US-101 SB off-ramp/ Yucca St	Off-ramp/Yucca St East of N Gower St	Freeway Ramp	55.1	55.5	0.3	0.0	No
US-101 SB off-ramp/ Yucca St	Off-ramp/Yucca St West of N Gower St	Freeway Ramp	63.3	64.7	1.4	0.0	No
US-101 SB on-ramp	On-ramp East of Argyle Ave	Freeway Ramp	60.7	62.4	1.7	0.2	No
US-101 SB on-ramp	On-ramp East of N Cahuenga Blvd	Freeway Ramp	58.9	60.3	1.4	0.0	No
US-101 SB ramps	Ramps North of Hollywood Blvd	Freeway Ramp	65.1	65.9	0.8	-0.2[b]	No
US-101 SB ramps	Ramps South of Hollywood Blvd	Freeway Ramp	60.8	64.8	3.9	0.1	No
Vine St	Between Fountain Ave and Lexington Ave	Commercial	70.6	71.9	1.3	0.0	No
Vine St	Between Hollywood Blvd and Selma Ave	Residential/ Commercial/ Hotel	70.6	71.6	1.0	0.1	No
Vine St	Between Santa Monica Blvd and Willoughby Ave	Commercial/ Educational	70.6	71.5	0.9	0.0	No
Vine St	Between Sunset Blvd and De Longpre Ave	Residential/ Commercial	70.8	72.2	1.4	0.1	No
Vine St	Between De Longpre Ave and Fountain Ave	Commercial	70.8	72.1	1.3	0.0	No
Vine St	Between Lexington Ave and Santa Monica Blvd	Commercial/ Hotel	70.7	71.9	1.2	0.0	No

TABLE IV.I-21
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2040) PLUS PROJECT CUMULATIVE INCREMENT

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)				
			Existing (A)	Future + Project (B)	Cumulative Increment[a] (B–A)	Project Increment	Exceed Threshold?
Vine St	Between Selma Ave and Sunset Blvd	Residential/ Commercial	70.5	71.7	1.1	0.1	No
Vine St	Between Willoughby Ave and Melrose Ave	Commercial/ Motel	70.5	71.3	0.9	0.0	No
Vine St	Between Yucca St and Hollywood Blvd	Commercial/ Educational	70.3	71.1	0.8	0.0	No
Vine St	South of Melrose Ave	Residential/ Religious	70.2	71.1	1.0	0.1	No
Vine St/ Dix St	East of Argyle Ave	Freeway Underpass	56.6	56.9	0.4	0.0	No
Vine St/ Dix St	West of Argyle Ave	Commercial/ Hotel	57.4	57.8	0.3	0.0	No
Vine St/ Franklin Ave	Between US-101 SB off-ramp and Yucca St	Commercial/ Hotel	64.7	65.7	1.0	0.0	No
Wilcox Ave	Between Franklin Ave and Yucca St	Residential/ Commercial	65.0	65.7	0.7	0.0	No
Wilcox Ave	Between Hollywood Blvd and Sunset Blvd	Commercial	65.9	68.2	2.3	0.0	No
Wilcox Ave	Between Yucca St and Hollywood Blvd	Residential/ Commercial	65.8	66.8	1.0	0.0	No
Wilcox Ave	North of Franklin Ave	Residential/ Commercial	63.4	64.3	0.9	0.0	No
Wilcox Ave	South of Sunset Blvd	Commercial	65.6	66.4	0.8	0.0	No
Willoughby Ave	Between Cahuenga Blvd and Vine St	Commercial/ Educational	64.6	65.0	0.4	0.0	No
Willoughby Ave	East of Vine St	Residential	61.9	62.2	0.4	0.0	No

TABLE IV.I-21
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2040) PLUS PROJECT CUMULATIVE INCREMENT

Street	Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)				
			Existing (A)	Future + Project (B)	Cumulative Increment[a] (B–A)	Project Increment	Exceed Threshold?
Willoughby Ave	West of Cahuenga Blvd	Commercial	66.2	66.5	0.4	0.0	No
Yucca St	Between Argyle Ave and N Gower St	Residential/ Religious	61.4	64.3	2.9	0.5	No
Yucca St	Between Ivar Ave and Vine St	Commercial/ Educational	64.5	65.4	0.9	0.4	No
Yucca St	Between N Cahuenga Blvd and Ivar Ave	Residential/ Commercial	62.8	63.8	1.0	0.4	No
Yucca St	Between Vine St and Argyle Ave	Residential/ Commercial	64.0	65.6	1.6	0.5	No
Yucca St	Between Wilcox Ave and N Cahuenga Blvd	Residential/ Commercial	59.1	59.8	0.7	0.0	No
Yucca St	West of Wilcox Ave	Residential	57.9	58.3	0.4	0.0	No

[a] Values may not add up exactly due to rounding in the modeling calculations.

[b] Negative value represents a relatively small decrease in traffic as projected in the traffic model, which reflects estimated travel patterns and the estimated traffic volume data, including the Project data that accounts for TNC trips.

SOURCE: ESA, 2020.

Cumulative noise levels would increase 3.4 dBA CNEL (from 60.5 to 63.9 dBA CNEL) at Cahuenga Boulevard south of Melrose Avenue and 3.1 dBA CNEL (from 62.8 to 65.9 dBA CNEL) at Selma Avenue between Argyle Avenue and N. Gower Street. The noise level increases would result in a "conditionally acceptable" noise level for residential and hotel uses. As shown previously in Table IV.I-15 the Project's contribution to the Future (Year 2040) Plus Project noise levels would be 0.2 dBA CNEL and 0.0 dBA CNEL, respectively. The Project's contribution to the cumulative noise levels would be substantially below the 3 dBA change in ambient noise levels that would be perceptible outside of a laboratory and are even substantially below the 1 dBA change in noise levels that cannot be perceived except in carefully controlled laboratory experiments.[54]

[54] Caltrans, TeNS, September 2013, Section 2.2.1.

As shown in Table IV.I-21, no other roadway segments, aside from Franklin Avenue west of N. Highland Avenue as discussed above, would have a cumulative increase of more than 5 dBA for areas normally or conditionally acceptable, namely along the US-101 southbound ramps south of Hollywood Boulevard, or a cumulative increase or more than 3 dBA for areas normally unacceptable or clearly unacceptable.

Although there would be a cumulative impact along one roadway segment with sensitive land uses, the Project would not result in a cumulatively considerable increase in off-site traffic noise levels under future year 2040 conditions. Accordingly, cumulative impacts would be less than significant for the Project and the Project with the East Site Hotel Option.

(iii) On-Site Operational Noise

With respect to on-site noise sources, as is the case for the Project, compliance with the LAMC-required provisions that limit stationary source noise from items such as mechanical equipment would ensure that noise levels would be less than significant at the property line for each related project. In addition, on-site noise generated by each related project would be required to meet the applicable noise requirements of the City's Municipal Code for stationary noise sources and sufficiently distant from the Project Site that it would not result in an additive increase to Project-related noise levels. Further, noise from other on-site sources, including parking lots, open space activity, emergency generator, and loading docks would be limited to areas in the immediate vicinity of each related project. Although each related project could potentially impact an adjacent sensitive use, that potential impact would be localized to that specific area and would not contribute to cumulative noise conditions at or adjacent to the Project Site. **Therefore, the Project considered together with related projects would have a less than significant cumulative impact with regard to stationary source noises.**

(iv) Groundborne Vibration

Due to the rapid attenuation characteristics of groundborne vibration and distance from each of the related projects to the Project Site, there is no potential for cumulative operational impacts with respect to groundborne vibration. **Therefore, operation of the Project, considered together with related projects, would not result in a significant cumulative impact for the Project and the Project with the East Site Hotel Option.**

(2) Mitigation Measures

Refer to Mitigation Measures NOI-MM-1 to NOI-MM-3 to reduce cumulative construction noise impacts. Refer to Mitigation Measure NOI-MM-4 to reduce cumulative construction vibration impacts. No additional mitigation measures are required.

Cumulative impacts related to operational noise would not occur. Therefore, no additional mitigation measures are required.

(3) Level of Significance After Mitigation

(a) On-Site Construction Noise

Given the Project's significant construction noise impacts on receptors 1, 3 and 5 through 13, if construction of one or more of these related projects were to overlap with Project construction, the Project's contribution to cumulative construction noise would be cumulatively considerable and would represent a significant cumulative impact. Mitigation Measures NOI-MM-1 and NOI-MM-2 would reduce the Project's on-site construction noise impacts at the off-site noise sensitive receptors, to the extent technically feasible.[55] Measures to reduce the types and numbers of construction equipment were considered. The noise analysis considered the expected types and numbers of construction equipment that would need to be used during the various construction activities and also considered the closest distances the construction activities would need to occur relative to the noise-sensitive uses in order to construct the proposed Project uses and achieve the Project objectives identified in Chapter II, *Project Description*, of this Draft EIR. Given the logarithmic nature of sound and the decibel scale, reducing the types and numbers of construction equipment by a few pieces of equipment would not result in a substantial reduction in noise levels. A 3 dBA reduction in noise requires a halving of the sound energy. Thus, there would be little benefit in terms of the construction noise levels by requiring a reduction in the types and numbers of construction equipment by only a few pieces of equipment. Given that a 3 dBA reduction in noise would require a halving of the construction sound energy, it would not be feasible to construct the proposed Project by substantially reducing the types and number of construction equipment used by half or more without severely impacting the ability to build the proposed Project within a reasonable schedule and the ability to safely and adequately construct the proposed Project buildings and facilities without access to the full range of the needed equipment.

(b) Off-Site Construction Noise

Should construction overlap with related project construction, the Project's contribution to cumulative construction noise would be cumulatively considerable and would represent a significant cumulative impact along common travel routes.

(c) Groundborne Vibration

Vibration impacts regarding structural damage and human annoyance in association with Related Project No. 2 would be cumulatively considerable and cumulative impacts due to construction vibration would be significant. Because consent of off-site property owners, who may not agree, would be required to implement the vibration mitigation for potential structural damage to their off-site structures, it is conservatively concluded that cumulative vibration impacts on the Pantages Theatre would be significant and

[55] As provided in LAMC Section 112.05, technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of the equipment.

unavoidable because it cannot be assured that all components of Mitigation Measure NOI-MM-4 can be implemented.

(d) Operation Traffic Noise

The Project would not result in a cumulatively considerable increase in off-site traffic noise levels under future year 2027 and 2040 conditions. Accordingly, cumulative impacts would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

(e) On-Site Operation Noise

Cumulative impacts regarding operational noise would be less than significant without mitigation. When considered together with related projects, operational noise impacts would not result in a cumulatively considerable impact. Accordingly, cumulative impacts would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

(f) Operational Groundborne Vibration

Cumulative impacts regarding operational groundborne vibration would be less than significant without mitigation. When considered together with related projects, operational groundborne vibration impacts would not result in a cumulatively considerable impact. Accordingly, cumulative impacts would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

IV. Environmental Impact Analysis

J. Population and Housing

1. Introduction

This section analyzes the potential effects of the Project's contribution to population, housing, and employment growth within the City of Los Angeles (City) in relation to growth forecasts adopted by the Southern California Association of Governments (SCAG), and to relevant policies and programs regarding population, housing and employment set forth in adopted land use plans**.** Supporting documentation is provided in Appendix L, Population, Housing, and Employment Projection Documentation, of this Draft Environmental Impact Report (EIR). Related information regarding the effects of the Project on land use plans and policies is further addressed in Section IV.H, *Land Use and Planning*. Potential growth-inducing impacts of the Project are further addressed in Chapter VI, *Other CEQA Considerations*.

2. Environmental Setting

a) Regulatory Framework

(1) Regional

(a) Southern California Association of Governments

The Project Site is located within the jurisdiction of the Southern California Association of Governments (SCAG), a Joint Powers Agency established under California Government Code Section 6502 et seq. Pursuant to federal and State law, SCAG serves as a Council of Governments, a Regional Transportation Planning Agency, and the MPO for Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial Counties. SCAG's mandated responsibilities include developing plans and policies with respect to the region's population growth, transportation programs, air quality, housing, and economic development. Specifically, SCAG is responsible for preparing the RTP/SCS and Regional Housing Needs Assessment (RHNA), in coordination with other state and local agencies. These documents include population, employment, and housing projections for the region and its 13 subregions. The Project Site is located within the Los Angeles Subregion.

On April 7, 2016, SCAG adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS), which is an

update to the previous 2012 RTP (it is updated every four years).[1] Using growth forecasts and economic trends, the 2016-2040 RTP/SCS provides a vision for transportation throughout the region for the next 25 years. It considers the role of transportation in the broader context of economic, environmental, and quality-of-life goals for the future, identifying regional transportation strategies to address mobility needs. The 2016-2040 RTP/SCS successfully achieves and exceeds the GHG emission-reduction targets set by CARB by demonstrating an eight percent reduction by 2020, 18 percent reduction by 2035, and 21 percent reduction by 2040 compared to the 2005 level on a per capita basis.[2] Compliance with and implementation of 2016-2040 RTP/SCS policies and strategies would have co-benefits of reducing per capita criteria air pollutant emissions associated with reduced per capita vehicle miles traveled (VMT).

SCAG's 2016-2040 RTP/SCS provides specific strategies for successful implementation. Strategies that are applicable to population, housing, and employment include:

- Supporting projects that encourage diverse job opportunities for a variety of skills and education, recreation and cultures and a full-range of shopping, entertainment and services all within a relatively short distance;
- Encouraging employment development around current and planned transit stations and neighborhood commercial centers;
- Promoting active transportation;
- Supporting local planning and projects that serve short trips; and
- Increasing access to light rail and bus stations.

Projections in the SCAG 2016-2040 RTP/SCS serve as the bases for demographic estimates in this analysis of Project consistency with growth projections. The findings regarding growth in the region are consistent with the methodologies prescribed by SCAG and reflect SCAG goals and procedures. SCAG data is periodically updated to reflect changes in development activity and planning at the local jurisdiction level (e.g. general plan and zoning changes).

SCAG forecasts regional growth through recent and past trends; key demographic and economic assumptions; and local, regional, State or federal policies. SCAG's Regional Growth Forecast includes three major indicators: population, households, and employment. Twenty scholars and practitioners participate on a panel to review the demographic and economic trends in the national and regional growth context, discuss key assumptions underlying growth forecasts, and to survey questions on major assumptions in collaboration with SCAG. A mid-range

1 Southern California Association of Governments (SCAG), 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS), 2016.

2 SCAG, 2016-2040 RTP/SCS, 2016, p. 8.

regional growth forecast is then further disaggregated into a smaller local jurisdiction, whose local input data is assessed alongside the regional level. Additional refinements are made to then reflect land-use transportation coordination through the planning process and the development of the policy growth forecast.[3]

(b) Regional Transportation Plan/Sustainable Communities Strategy

In April 2016, SCAG's Regional Council adopted the 2016-2040 RTP/SCS.[4] As previously discussed, the 2016-2040 RTP/SCS presents the transportation vision for the region through the year 2040 and provides a long-term investment framework for addressing the region's transportation system and related challenges. As it relates to population and housing, the RTP/SCS contains baseline socioeconomic projections that are the basis for SCAG's transportation planning and the provision of services by other regional agencies. It includes projections of population, households, and employment forecasted for 2020, 2035, and 2040 at the regional, county, and local jurisdictional levels, and Traffic Analysis Zones (TAZ) that provide small area data for transportation modeling.[5] The RTP/SCS identifies the amount of expected growth in the region and provides the expected distribution of that growth.

The 2016-2040 RTP/SCS recognizes the need to provide an integrated approach to protect, maximize the productivity of, and strategically expand the region's transportation system. An important component of this strategy is "Smart Land Use."[6] SCAG has been attempting to integrate land use and transportation by working with subregions and local communities to increase development densities near transit and improve the jobs/housing balance. Smart land use strategies encourage walking, biking, and transit use, thereby reducing vehicular demand, saving travel time, reducing pollution, and ultimately improving health.[7]

A component of the SCAG strategy has been to focus new growth in High-Quality Transit Areas (HQTAs), Hollywood being an integral component of this strategy.[8] HQTAs are defined as areas located within one-half mile of a fixed guideway transit stop or bus transit corridor where buses pick up passengers every 15 minutes or less during peak commute hours. While HQTAs account for only three percent of the total land area in SCAG's region, HQTAs are expected to accommodate 46 percent and 55 percent of future household and employment growth, respectively,

3 SCAG, 2016 RTP/SCS, Demographics & Growth Forecast Appendix, 2016, pp. 16-17.
4 SCAG, 2016 RPT/SCS, Resolution No. 16-578-2, 2016.
5 SCAG, 2016-2040 RTP/SCS, Demographics & Growth Forecast Appendix, 2016.
6 SCAG, 2016-2040 RTP/SCS, Figure 5.1, System Management Pyramid, 2016, p. 85.
7 SCAG, 2016-2040 RTP/SCS, 2016, p. 16.
8 SCAG, 2016-2040 RTP/SCS, 2016, p. 20.

between 2012 and 2040.[9] Developments within HQTAs are intended to produce high quality housing with consideration of urban design, construction, and durability, and result in increased ridership on important public transit investments. HQTAs would integrate land use and transportation to achieve SCAG's long-term goals for greater mobility, stronger economy, and more sustainable growth.[10]

(c) Regional Housing Needs Assessment

SCAG prepares the RHNA mandated by State law so that local jurisdictions can use this information during their periodic update of the General Plan Housing Element. The RHNA identifies the housing needs for very low income, low income, moderate income, and above moderate-income groups. The most recent RHNA allocation, the 5th Cycle RHNA Allocation Plan, was adopted by SCAG's Regional Council on October 4, 2012.[11] This allocation identifies housing needs for the planning period between January 2014 and October 2021. Local jurisdictions are required by State law to update their General Plan Housing Elements based on the most recently adopted RHNA allocation.

(2) Local

(a) City of Los Angeles General Plan

The City of Los Angeles General Plan was prepared pursuant to State law to guide future development and to identify the City's environmental, social, and economic goals. The General Plan sets forth goals, objectives, and programs to provide a guideline for day-to-day land use policies and to meet the existing and future needs and desires of the City, while at the same time integrating a range of State-mandated elements including Transportation, Noise, Safety, Housing, and Open Space/Conservation. The General Plan also includes the General Plan Framework Element, discussed below, and a series of community plans, which guide land use at the community level for the area surrounding the Project Site. As discussed in more detail below, the Project Site is located in the Hollywood Community Plan area.

(i) City of Los Angeles General Plan Framework

The City of Los Angeles General Plan Framework Element (Framework Element) was approved in 1996 by the City Council and re-adopted in 2001.[12] The General Plan Framework sets forth a citywide comprehensive long-range growth strategy and defines citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development,

9 SCAG, 2016-2040 RTP/SCS, 2016, p. 75.

10 SCAG, 2016-2040 RTP/SCS, 2016, pp. 25-27.

11 SCAG, Regional Housing Needs Assessment, 2012, http://rtpscs.scag.ca.gov/Pages/Regional-Housing-Needs-Assessment.aspx, accessed July 5, 2018.

12 City of Los Angeles, The Citywide General Plan Framework, An Element of the City of Los Angeles General Plan, adopted by the City Planning Commission on July 27, 1995, adopted by City Council on December 11, 1996, re-adopted on August 8, 2001.

transportation, infrastructure, and public services. General Plan Framework land use policies are implemented at the community level through the City's Community Plans and Specific Plans.

The General Plan Framework Housing Chapter states that housing production has not kept pace with the demand for housing. According to the General Plan Framework, the City has insufficient vacant properties to accommodate the projected population growth and that the supply of land zoned for residential development is constrained.[13] The Housing Chapter states that new residential development will require the recycling and/or intensification of existing developed properties. The General Plan Framework states that the City must strive to meet the housing needs of the population in a manner that contributes to stable, safe, and livable neighborhoods, reduces conditions of overcrowding, and improves access to jobs and neighborhood services. In particular, Policy 4.1.1 of the Housing Chapter states that the City should "[p]rovide sufficient land use and density to accommodate an adequate supply of housing units by type and cost within each City subregion to meet the 20-year projections of housing needs." Objective 4.2 "[e]ncourage[s] the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods."[14]

The Economic Development Chapter of the Framework Element includes a number of policies regarding the provision of commercial land development. Policy 7.2.2 states that commercial development entitlements should be concentrated in areas best able to support them, including community and regional centers, transit stations, and mixed-use corridors, so as to prevent commercial development from encroaching on existing residential neighborhoods. Policy 7.2.3 encourages new commercial development in proximity to rail and bus transit corridors.[15]

(ii) General Plan Housing Element

The Housing Element of the General Plan is prepared pursuant to State law and provides planning guidance in meeting the housing needs identified in SCAG's RHNA. The Housing Element identifies the City's housing conditions and needs, establishes the goals, objectives, and policies that are the foundation of the City's housing and growth strategy, and provides the array of programs the City intends

13 City of Los Angeles, General Plan Framework, Chapter 4 Housing, Summary of Housing Issues, re-adopted 2001.

14 City of Los Angeles, General Plan Framework, Chapter 4 Housing, Goals, Objectives, and Policies, re-adopted 2001.

15 City of Los Angeles, General Plan Framework, Chapter 7 Economic Development, Goals, Objectives, and Policies, re-adopted 2001.

to implement to create sustainable, mixed-income neighborhoods. The 2013-2021 Housing Element, based on the updated 2012 RHNA, was adopted by the City Council on December 3, 2013.[16] Policies of note include Policy 1.1.3 that states the City should "[f]acilitate new construction and preservation of a range of housing types that address the particular needs of the city's households."[17] Also, Policy 1.3.5 states that the City should "[p]rovide sufficient land use and density to accommodate an adequate supply of housing units by type and cost within the City to meet the projections of housing needs, according to the policies and objectives of the City's Framework Element of the General Plan." The Housing Element carries forward the goals of the Framework Element Housing Chapter to encourage the development of livable neighborhoods and preservation of the housing supply.

Chapter 1, Housing Needs Assessment, identifies the City's share of the housing needs established in the RHNA. In particular, Table 1.29, City of Los Angeles Regional Housing Needs Assessment Allocation, indicates that the City's needs assessment allocation includes 82,002 housing units of which 35,412 units, or 43.2 percent, would be for above moderate income households.[18] The remaining 56.8 percent of the needed housing units consist of 13,728 moderate-income units (16.8 percent), 12,435 low-income units (15.2 percent), 10,213 very low-income units (12.5 percent), and 10,213 extremely low-income units (12.5 percent). This allocation represents one-fifth of the total need of 412,721 housing units identified for the six-county SCAG region. The percentage increased from the previous housing needs cycle and City proportion, which was one-sixth of the regional need for the same types of units.

The Housing Element also establishes quantifiable objectives regarding the number of new housing units it anticipates being constructed. The Housing Element's objective for new housing citywide by 2021 is 59,559 dwelling units, comprised of 46,500 above moderate income units, 1,122 moderate income units, 4,873 low income units, 3,834 very low income units and 1,730 extremely low income units.[19]

(b) Hollywood Community Plan

The Land Use Element of the City's General Plan is comprised of 35 Community Plans. The City's Community Plans are intended to provide an official guide for

16 City of Los Angeles Department of City Planning, Housing Element 2013-2021, Adopted December 3, 2013.
17 City of Los Angeles Department of City Planning, Housing Element 2013-2021, 2013, p. 6-6.
18 City of Los Angeles Department of City Planning, Housing Element 2013-2021, 2013, p. c-xvi.
19 City of Los Angeles Department of City Planning, Housing Element 2013-2021, 2013, Table ES.1, p. c-xxi.

future development and propose approximate locations and dimensions for land use at the community level. The Community Plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems.[20] The City's Community Plans implement the City's General Plan Framework Element at the local level. The City's Community Plans express the goals, objectives, policies, and programs to address growth within each of the individual communities and depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities. The Project is located within the Hollywood Community Plan (Community Plan) area.

The Hollywood Community Plan was adopted in 1988 and addresses growth and the arrangement of land uses within its boundaries through the year 2010.[21] As discussed in Chapter II, *Project Description*, the adoption of the 2012 Hollywood Community Plan Update following litigation was rescinded and its approval was set aside. Accordingly, the 1988 Hollywood Community Plan is still in effect. While the 1988 Hollywood Community Plan includes data for population, housing, and employment at the local level, the Hollywood Community Plan does not provide growth projections beyond 2010, and does not reflect the more current regional planning documents.

The 1988 Hollywood Community Plan includes objectives that guide development of the Hollywood area. Key provisions regarding the preferred development in the Project vicinity as it relates to population and housing include the following:[22]

> **Objective 3:** To make provision[s] for the housing required to satisfy the varying needs and desires of all economic segments of the Community, maximizing the opportunity for individual choice.
>
> **Objective 4a:** To promote economic well being and public convenience through allocating and distributing commercial lands for retail, service, and office facilities in quantities and patterns based on accepted planning principles and standards.

(c) L.A.'s Green New Deal (Sustainable City pLAn 2019)

In April 2019, Mayor Eric Garcetti released L.A.'s Green New Deal (Sustainable City pLAn 2019). Rather than an adopted plan, the Green New Deal is a mayoral initiative that consists of a program of actions designed to create sustainability-based performance targets through 2050 that advance economic, environmental,

20 City of Los Angeles, General Plan Framework, Chapter 3, Land Use, re-adopted 2001.

21 City of Los Angeles Department of City Planning, Hollywood Community Plan, adopted December 13, 1988, p. HO-2.

22 City of Los Angeles Department of City Planning, Hollywood Community Plan, adopted December 13, 1988, p. HO-1.

and equity objectives.[23] The City's Green New Deal is the first four-year update to the City's first Sustainable City pLAn that was released in 2015.[24] It augments, expands, and elaborates in even more detail the City's vision for a sustainable future, and it tackles the climate emergency with accelerated targets and new aggressive goals.

The Housing & Development chapter of the Green New Deal includes the following targets:

- Ensure 57 percent of new housing units are built within 1,500 feet of transit by 2025 and 75 percent by 2035;
- Increase cumulative new housing unit construction to 150,000 by 2025 and 275,000 units by 2035; and
- Create or preserve 50,000 income-restricted affordable housing units by 2035 and increase stability for renters.

b) Existing Conditions

(1) On-Site Conditions

The Project Site is situated in the central part of the Hollywood Community Plan area and is bifurcated by Vine Street, which splits the Project Site into the West Site (located between Ivar Avenue and Vine Street) and the East Site (located between Vine Street and Argyle Avenue). The Project Site is located within a SCAG-designated HQTA, as it is located approximately 600 feet north of the Los Angeles County Metropolitan Transportation Authority (Metro) Red Line Hollywood/Vine Station.[25] As the Project would be a mixed-use residential development located on an infill site, and given proximity to the Metro Red Line Hollywood/Vine Station and other regional-serving transportation facilities, the Project also falls within a City-designated Transit Priority Area (TPA).

The Project Site is currently developed with a single-story commercial building currently leased by the American Musical and Dramatic Academy (AMDA) and paid public surface parking lot on the West Site and the Capitol Records Building and Gogerty Building (the Capitol Records Complex) with a dedicated surface parking lot on the East Site. No existing housing or other commercial uses are located on the Project Site. The AMDA-leased building is used on a daily basis for sets and props, but no employees are directly generated by the building. In addition, the existing employees associated with the Capitol Records Complex would not be affected by the Project. Therefore, for conservative purposes, it is

23 City of Los Angeles, L.A.'s Green New Deal, Sustainable City pLAn, 2019.
24 City of Los Angeles, Sustainable City pLAn, April 2015.
25 SCAG, 2016-2040 RTP/SCS, Exhibit 5.1, 2016, p. 77.

assumed that all new population, housing, and employees generated by the Project would represent an increase over current conditions.

(2) Population, Housing, and Employment Estimates

Current and future projected population, housing, and employment estimates for the City are based on data included in the 2016-2040 RTP/SCS, which is described in greater detail below.

The 2016-2040 RTP/SCS prepares growth projections for populations, households, and employment for regional, county, and local jurisdictional areas (City).[26] The 2016-2040 RTP/SCS reports the demographic data for years 2012 and 2040. The 2016-2040 RTP/SCS forecasts represent the likely growth scenario for the Southern California region in the future, taking into account recent and past trends, reasonable key technical assumptions, and local or regional growth policies.[27]

The 2018 Project baseline population, as well as growth projections for 2027 (Project buildout year) and 2040 (SCAG Projection Horizon) are shown below in **Table IV.J-1**, *Projected Population, Housing and Employment Estimates for the City of Los Angeles*, and are discussed in more detail below.[28]

TABLE IV.J-1
PROJECTED POPULATION, HOUSING AND EMPLOYMENT ESTIMATES FOR THE CITY OF LOS ANGELES

		2027 (Project Buildout Year)			2040 (SCAG Projection Horizon)		
	Project Baseline (2018)	Projected	Total Growth	Percentage Increase as Compared to 2018	Projected	Total Growth	Percentage Increase as Compared to 2018
Population	4,009,193	4,254,733	245,540	6.1%	4,609,400	600,207	15.0%
Housing	1,403,672	1,520,929	117,257	8.4%	1,690,300	286,628	20.4%
Employment	1,797,693	1,949,633	151,940	8.5%	2,169,100	371,407	20.7%

SOURCE: Based on SCAG data prepared for the 2016-2040 RTP/SCS, 2016. Compiled by ESA, 2020. 2018 and 2027 baseline, projected and total growth numbers based on interpolated data from the 2012 and 2040 data in the 2016-2040 RTP/SCS.

26 SCAG, 2016-2040 RTP/SCS, Demographics & Growth Forecast Appendix, 2016, p. 21.

27 SCAG, 2016-2040 RTP/SCS, Demographics & Growth Forecast Appendix, 2016, p. 1.

28 The 2018 baseline estimates were determined by interpolating from data presented in the SCAG projections based on values provided for 2012 and 2040. The 2018 estimate is calculated by: [(2040 data – 2012 data) / 28 years) * 6 years)] + 2012 data = 2018 baseline estimate. The 2027 estimate is calculated by: [((2040 data – 2012 data) / 28 years) * 15 years)] + 2012 data = 2027 buildout estimate. The 2040 estimates are provided by SCAG in the 2016 -2040 RTP/SCS. See Appendix L of this Draft EIR for calculations.

(a) Population

As indicated in Table IV.J-1, the City population is expected to grow by 245,540 people or 6.1 percent from the 2018 baseline year to 2027 (Project Buildout year). By 2040, the horizon year of the SCAG projections, the population is expected to increase in the City by 600,207 people or 15.0 percent.

(b) Housing

As indicated in Table IV.J-1, the number of households/occupied housing units in the City is expected to increase by 117,257 units or 8.4 percent from 2018 to 2027. By 2040, the number of households in the City is expected to grow by 286,628 units or 20.4 percent.

(c) Employment

As shown in Table IV.J-1, the number of employees in the City is expected to grow by 151,940 employees or 8.5 percent from 2018 to 2027. By 2040, the number of workers in the City is expected to grow by 371,407 workers or 20.7 percent.

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to population and housing if it would:

Threshold (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); or

Threshold (b): Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold Questions. The factors to evaluate population and housing impacts include:

- The degree to which the project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/buildout, and that would result in an adverse physical change in the environment;

- Whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and
- The extent to which growth would occur without implementation of the project.

b) Methodology

The analysis of population and housing impacts evaluates whether the Project's contribution to population, housing, and/or employment growth are consistent with the future growth projections and related policies outlined above in order to assess the potential for impacts on the physical environment.

As explained above, because the 1998 Hollywood Community Plan did not provide growth projections beyond 2010, the growth projections provided for the Hollywood Community Plan area do not reflect current conditions or future projections. Therefore, the 2016-2040 RTP/SCS is the most recently adopted regional plan that provides population, housing, and employment projections for the City of Los Angeles for the period between 2012 and 2040. Therefore, for the purpose of the Project's analysis, population, housing, and employment projections based on the 2016-2040 RTP/SCS for the City are analyzed with the Project growth to determine impacts. As the 2016-2040 RTP/SCS provides data and projections for 2012 and 2040 only, projections for Project Baseline Year 2018 and Project Buildout Year 2027 are interpolated from the 2012 and 2040 data (see calculations in Appendix L of this Draft EIR).

The Project's proposed residential population was calculated based on the Citywide Person Per Household Factor for multi-family units.[29] The employment estimates for the Project are based on an Economic and Fiscal Impact Report (Economic Report) of the Environmental Leadership Development Project (ELDP) Application prepared for the Project, provided in Appendix B of this Draft EIR.[30]

The Project's population, housing, and employment impacts are then compared to projections from SCAG for the City of Los Angeles. The Project's impacts are also evaluated against other applicable City and regional/household goals, objectives and policies, and other CEQA significance thresholds.

c) Project Design Features

No specific Project Design Features are proposed with regard to population, housing, and employment.

29 Based on 2017 Census American Community Survey 5-Year Estimate data (2013–2017), www.census.gov/programs-surveys/acs/technical-documentation/table-and-geography-changes/2015/5-year.html, per correspondence with Jack Tsao, Housing Planner, Los Angeles Department of City Planning, July 31, 2019.

30 HR&A Advisors, Economic and Fiscal Impact Report, Hollywood Center Project, April 2018. Provided in Appendix B of this Draft EIR.

d) Analysis of Project Impacts

Threshold (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)?

Construction activities, including excavation depths, building footprint, and construction methods, would be essentially the same under the Project or the Project with the East Site Hotel Option. Accordingly, Project-related construction impacts would be essentially the same under the Project or the Project with the East Site Hotel Option. Thus, the conclusions regarding the construction impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

During operation, the Project and the Project with the East Site Hotel Option would have different population, housing, and employment statistics. Therefore, separate Project and Project with the East Site Hotel Option calculations and analyses are provided under this threshold.

(1) Impact Analysis

(a) Construction Impacts

The construction of the Project would result in increased employment opportunities in the construction field, which could potentially result in increased permanent population and demand for housing in the vicinity of the Project Site. However, the employment patterns of construction workers in Southern California are such that it is not likely that they would relocate their households as a consequence of the construction employment associated with the Project. The construction industry differs from most other industry sectors in several ways:

- There is no regular place of work. Construction workers regularly commute to job sites that change many times over the course of a year. Their sometimes lengthy daily commutes are facilitated by the off-peak starting and ending times of the typical construction workday;
- Many construction workers are highly specialized (e.g., crane operators, steelworkers, masons, etc.) and move from job site to job site as dictated by the demand for their skills; and
- The work requirements of most construction projects are highly specialized. Workers remain at a job site only for the time frame in which their specific skills are needed to complete a particular phase of the construction process.

Therefore, Project-related construction workers would not be likely to relocate their place of residence as a consequence of working on the Project. Although

construction of the Project would generate direct (in the form of short-term construction jobs at the Project Site), indirect (in the form of employment supported by Project construction-related expenditures), and induced (in the form of wages paid to construction workers) employment impacts, Project-related construction would not represent a permanent or substantial new employment generator that would significantly contribute to local or regional growth. There would be no significant housing or population impacts from construction of the Project. **Therefore, Project or Project with the East Site Hotel Option construction would not induce substantial population growth indirectly in the Project area, and impacts would be less than significant.**

(b) Operational Impacts

(i) Project Population, Housing, and Employment Generation

With Project implementation, the Project Site would be developed with four new buildings, including a 35-story building on the West Site (West Building), a 46-story building on the East Site (East Building), and an 11-story senior building set aside for Extremely Low and Very Low Income senior households on each respective Site (West Senior Building and East Senior Building). The Project would include a total of 1,005 residential housing units (872 market-rate units and 133 senior affordable housing units), totaling approximately 1,256,974 square feet of residential floor area and approximately 30,176 square feet of commercial floor area (retail and restaurant uses). The Project's projected increase in residential population and housing stock are summarized in **Table IV.J-2**, *Estimate of Project Population and Housing*.

TABLE IV.J-2
ESTIMATE OF PROJECT POPULATION AND HOUSING

Land Use	Average Household Size[a]	Total Population
West Site Residential Units – 517	2.42	1,251.14
East Site Residential Units – 488	2.42	1,180.96
Total Residential Units – 1,005		2,433[b]

[a] Based on 2017 Census American Community Survey 5-Year Estimate data (2013–2017), www.census.gov/programs-surveys/acs/technical-documentation/table-and-geography-changes/2015/5-year.html, per correspondence with Jack Tsao, Housing Planner, Los Angeles Department of City Planning, July 31, 2019.

[b] Total population estimate rounded up to next whole number for conservative analysis.

SOURCE: ESA, 2019.

The Project's projected increase in employment opportunities is summarized in **Table IV.J-3**, *Estimate of Project Employment*.

TABLE IV.J-3
ESTIMATE OF PROJECT EMPLOYMENT[a]

Use	Amount	Employees
West Site Restaurant/Retail Uses	12,691 square feet	87
East Site Restaurant/Retail Uses	17,485 square feet	119
Total Restaurant/Retail Uses	30,176 square feet	206

[a] Employment projection calculations based on the employee generation rates included in the Economic and Fiscal Impact Report, Hollywood Center Project, prepared by HR&A Advisors, Inc., April 2018.

SOURCE: ESA, 2019.

(a) Population

SCAG's 2016-2040 RTP/SCS provides short-term and long-term population estimates for the City. As shown in Table IV.J-1 above, the population in the City was estimated to be 4,009,193 in 2018 and is projected to be 4,254,733 in 2027, the Project's projected buildout year. The Project's contributions to growth projections in the SCAG 2016-2040 RTP/SCS for the City are shown in in **Table IV.J-4**, *Project Population, Housing, and Employment Impacts for the City of Los Angeles*.

TABLE IV.J-4
PROJECT POPULATION, HOUSING, AND EMPLOYMENT IMPACTS FOR THE CITY OF LOS ANGELES

	Project Increase[a]	SCAG Projected Growth[b]	Project Percentage of Growth
Population			
2018 - 2027 Buildout	2,433	245,540	1.0%
2018 - 2040 Projection Horizon	2,433	600,207	0.4%
Households			
2018 - 2027 Buildout	1,005	117,257	0.9%
2018 - 2040 Projection Horizon	1,005	286,628	0.4%
Employment			
2018 - 2027 Buildout	206	151,940	0.1%
2018 - 2040 Projection Horizon	206	371,407	0.1%

[a] From Table IV.J-2 for population and households, and Table IV.J-3 for employment.

[b] From Table IV.J-1.

SOURCE: ESA, 2018. Based on SCAG 2016-2040 RTP/SCS projections.

As shown in Table IV.J-4, the Project's 2,433 residents upon anticipated buildout would comprise approximately 1.0 percent of SCAG's estimated population growth by 2027. SCAG's longer-term projected population increase for the City in 2040 is an additional 600,207 residents for a total residential population of 4,609,400; therefore, the Project would comprise approximately 0.4 percent of SCAG's total population increase for the City between 2018 and 2040.

On a regional level, as with most of Hollywood, the Project Site is located within a SCAG-designated HQTA, as it is located approximately 600 feet north of the Metro Red Line Hollywood/Vine Station.[31] The Project's development would support the attainment of the SCAG policies discussed in Subsection IV.J.2, Environmental Setting, by providing increased population density within an area that is targeted to provide high-density development along transit corridors.[32] The Project's mixed-use components and contributions to walkable communities would also contribute to the attainment of the SCAG policies. The Project would provide a transit-oriented development in proximity to public transit, which would result in reduced use of vehicles and per capita VMT.

At the local level, the Project would be in compliance with the objectives and policies found within the City's General Plan, Hollywood Community Plan, and L.A's Green New Deal (Sustainable City pLAn 2019). The Project would develop new housing in areas designated for increased population growth in proximity to transit, ensuring that the new units would be accessible to high-quality transit.

The Project's contribution to population growth continues an infill growth pattern that is encouraged locally in the City's plans and regionally by SCAG policies and is well within the projected growth forecasts for the City and region. Thus, the Project is consistent with State, regional, and local policies. The Project's contribution to population growth would fall within and be consistent with SCAG population projections for the City. **As such, impacts related to induced substantial unplanned population growth under the Project during long-term operation of the Project would be less than significant.**

(b) Housing

As shown in Table IV.J-4, the Project's proposed 1,005 housing units would comprise 0.9 percent of SCAG's year 2027 estimated increase of 117,257 households within the City. The Project would comprise 0.4 percent of SCAG's 2040 estimated increase of 286,628 households within the City. The Project would induce planned population growth directly through the introduction of 1,005 housing units on the Project Site which currently has no residential uses. This growth would contribute towards the attainment of City and regional goals and policies to encourage housing development in the greater Hollywood area. In

31 SCAG, 2016-2040 RTP/SCS, Exhibit 5.1, 2016, p. 77.
32 SCAG, 2016-2040 RTP/SCS, 2016, p. 8.

particular, Objective 4.2 of the Housing Chapter states that the City should "[e]ncourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods."[33] The Project Site is located in a SCAG-designated HQTA and approximately 600 feet north of the Metro Red Line Hollywood/Vine Station. The Project Site's accessibility to transit would help the City increase housing in HQTAs, and would contribute to the City's ability to meet its housing obligation under SCAG's RHNA and Objective 4.2 of the Housing Chapter. **Therefore, impacts related to induced substantial unplanned population growth through the Project's contribution to housing during long-term operation would be less than significant.**

(c) Employment

Improving the jobs/housing balance is one tool for reducing impacts on the environment by reducing vehicle miles traveled (VMT). The ratio of jobs to housing is one indicator of proximity between employment and residential locations for population in the region. The jobs/housing ratio for the entire SCAG region is approximately 1.35 (i.e., there are approximately 1.35 jobs for each household unit).[34] Large variations from this ratio in local communities indicate whether the communities are housing-rich (i.e. bedroom communities) or employment-rich. Bedroom communities require longer commuting distances between home and work. Communities whose ratios are closer to 1.35 have more of a balance between residents and employees within their boundaries.

Based on the 2018 employment and household estimates presented in Table IV.J-1, above, the 2018 jobs/housing ratio in City is 1.281. The projected 2027 estimate for the City would be increased slightly to 1.282. The projected 2040 estimate is 1.283. Inclusion of the Project to the City's employment and household numbers would maintain the jobs/housing ratio of 1.280, 1.281, and 1.283 for 2018, 2027, and 2040, respectively. While the City's jobs/housing ratio is close to the regional average, the distribution of employment within the City is not proportioned evenly, which skews the overall City's jobs/housing ratio. In particular, the particular areas of the City, such as the Downtown area, are disproportionately housing-oriented or employment-oriented as compared to other areas. City and regional policies have encouraged the placement of a proportionate increase in the number of housing units as compared to jobs so as to bring the City's ratio closer to the regional balanced ratio of 1.35.

33 City of Los Angeles, General Plan Framework, Chapter 4 Housing, Goals, Objectives, and Policies, re-adopted 2001.

34 SCAG, 2016-2040 RTP/SCS, Demographics & Growth Forecast Appendix, 2016. Based on 2015 employment of 8,006,000 as presented in Table 8, Regional Population and Employment by County, page 18; and 5,947,000 households as presented in Table 4, Characteristics of Regional Households, p. 8.

Therefore, impacts related to induced substantial unplanned population growth through the Project's contribution to employment during long-term operation would be less than significant.

(ii) Project with the East Site Hotel Option Population, Housing, and Employment Generation

Under the Project with the East Site Hotel Option, the West Site would remain the same as under the Project and would replace 104 residential units within the East Building with a 220-room hotel. The number of affordable residential units within the East Senior Building would be proportionally reduced by 17 units. Under the Project with the East Site Hotel Option, there would be 884 residential housing units (768 market-rate units and 116 senior affordable housing units) with an approximately 220-room hotel, comprising approximately 130,278 square feet of floor area, and 30,176 square feet of other commercial floor area (retail and restaurant uses). The Project with the East Site Hotel Option's projected contributions to residential population and housing stock are summarized in **Table IV.J-5**, *Estimates of the Project with the East Site Hotel Option Population and Housing*.

TABLE IV.J-5
ESTIMATE OF THE PROJECT WITH THE EAST SITE HOTEL OPTION POPULATION AND HOUSING

Land Use	Average Household Size[a]	Total Population
West Site Residential Units – 517	2.42	1,251.14
East Site Residential Units – 367	2.42	888.14
Total Residential Units – 884		2,140[b]

[a] Based on 2017 Census American Community Survey 5-Year Estimate data (2013–2017), www.census.gov/programs-surveys/acs/technical-documentation/table-and-geography-changes/2015/5-year.html, per correspondence with Jack Tsao, Housing Planner, Los Angeles Department of City Planning, July 31, 2019.

[b] Total population estimate rounded up to next whole number for conservative analysis.

SOURCE: ESA, 2019.

The Project with the East Site Hotel Option's projected increase in employment opportunities is summarized in **Table IV.J-6**, *Estimate of the Project with the East Site Hotel Option Employment*.

TABLE IV.J-6
ESTIMATE OF THE PROJECT WITH THE EAST SITE HOTEL OPTION EMPLOYMENT[a]

Use	Amount	Employees
West Site Restaurant/Retail Uses	12,691 square feet	87
East Site Restaurant/Retail Uses	17,485 square feet	119
East Site Hotel	130,278 square feet	239
Total Employees		**445**

[a] Employment projection calculations based on the employee generation rates included in the Economic and Fiscal Impact Report, Hollywood Center Project, prepared by HR&A Advisors, Inc., April 2018.

SOURCE: ESA, 2020.

(a) Population

The Project with the East Site Hotel Option's contribution to growth projections in the SCAG 2016-2040 RTP/SCS for the City are shown in **Table IV.J-7**, *Project with the East Site Hotel Option Population, Housing, and Employment Impacts for the City of Los Angeles*.

TABLE IV.J-7
PROJECT WITH THE EAST SITE HOTEL OPTION POPULATION, HOUSING, AND EMPLOYMENT IMPACTS FOR THE CITY OF LOS ANGELES

	Project Increase[a]	SCAG Projected Growth[b]	Project Percentage of Growth
Population			
2018 - 2027 Buildout	2,140	245,540	0.9%
2018 - 2040 Projection Horizon	2,140	600,207	0.4%
Households			
2018 - 2027 Buildout	884	117,257	0.8%
2018 - 2040 Projection Horizon	884	286,628	0.3%
Employment			
2018 - 2027 Buildout	445	151,940	0.3%
2018 - 2040 Projection Horizon	445	371,407	0.1%

[a] From Table IV.J-5 for population and households, and Table IV.J-6 for employment.

[b] From Table IV.J-1.

SOURCE: ESA, 2020. Based on SCAG 2016-2040 RTP/SCS projections.

As shown in Table IV.J-7, the Project with the East Site Hotel Option's 2,140 residents upon anticipated buildout would comprise approximately 0.9 percent of SCAG's estimated population growth by 2027. The Project with the East Site Hotel Option would comprise approximately 0.4 percent of SCAG's total population increase for the City between 2018 and 2040.

Under the Project with the East Site Hotel Option, the Project would also achieve the goals encouraged locally in the City's plans and regionally by SCAG policies., In addition, the population growth under the Project with the East Site Hotel Option would be consistent with SCAG population projections for the City. **As such, impacts related to induced substantial unplanned population growth under the Project with the East Site Hotel Option during long-term operation of the Project would be less than significant.**

(b) Housing

The Project with the East Site Hotel Option's 884 proposed residential units, of which 116 units would be designated for senior affordable housing, would contribute to meeting the Housing Element's housing mix needs. As shown in Table IV.J-7, the Project with the East Site Hotel Option's proposed 884 housing units would comprise 0.8 percent of SCAG's year 2027 estimated increase of 117,257 households within the City; and 0.3 percent of SCAG's 2040 estimated increase of 286,628 households. Similar to the Project, the Project with the East Site Hotel Option would induce population growth directly through the introduction of the 884 housing units on the Project Site, which currently has no residential uses, thus contributing to the attainment of City and regional goals and policies to encourage housing development in the Hollywood area and within an HQTA. **Therefore, impacts related to induced substantial unplanned population growth through the Project with the East Site Hotel Option's contribution to housing during long-term operation would be less than significant.**

(c) Employment

As previously stated, the 2018 jobs/housing ratio in City is 1.281. The projected 2027 estimate for the City would be increased slightly to 1.282. The projected 2040 estimate is 1.283. Inclusion of the Project with the East Site Hotel Option to the City's employment and household numbers would maintain the jobs/housing ratio of 1.280, 1.281, and 1.283 for 2018, 2027, and 2040, respectively.

Similar to the Project, the Project with the East Site Hotel Option would comply with the regional and local objectives and policies to strengthen commercial development in HQTAs and areas located in proximity to transit, as well as locating employment opportunities near new housing developments. **Therefore, impacts related to induced substantial unplanned population growth under the Project with the East Site Hotel Option's contribution to employment during long-term operation would be less than significant.**

(iii) Infrastructure

Under the Project and the Project with the East Site Hotel Option, the Project would link with and tie into existing infrastructure in the Project area. New infrastructure that would be required, such as service connections to local water and sewer network and electricity and natural gas utilities would be sized to serve only the Project's needs.

Project operation would modify access from the streets that surround the Project Site as discussed in Chapter II, *Project Description*, and in Section IV.L, *Transportation*, of this Draft EIR. However, these modifications represent improvements that would not induce substantial population growth indirectly through the extension of roads or other infrastructure. **Therefore, infrastructure improvements under the Project or the Project with the East Site Hotel Option would not induce substantial unplanned population growth in an area, either directly or indirectly, and impacts would be less than significant.**

(iv) Conclusion

The Project or the Project with the East Site Hotel Option would not 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). Therefore, the Project would result in less than significant impacts related induced substantial unplanned population growth.

(2) Mitigation Measures

Impacts related to unplanned population, housing, and employment were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts related to unplanned population, housing and employment were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (b): Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The Project and the Project with the East Site Hotel Option would not displace people or housing. Accordingly, Project impacts under Threshold (b) would be the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the impact analysis and impact significance presented

below are the same and apply to the Project and the Project with the East Site Hotel Option.

As discussed in Chapter VI.6, Impacts Found Not to be Significant, of this Draft EIR and in the Initial Study (Appendix A) of the Draft EIR, **the Project or the Project with the East Site Hotel Option would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere because there are no residential uses currently on the Project Site, and, therefore, no impact would occur with respect to Threshold (b). No further analysis is required.**

e) Cumulative Impacts

The Project and the Project with the East Site Hotel Option would not induce substantial population growth resulting in less-than-significant Project-level impacts. Further, as the cumulative growth percentages described below (see Table IV.J-9) are nearly the same under the Project and the Project with the East Site Hotel Option, cumulative impacts would be essentially the same under the Project or the Project with the East Site Hotel Option. Thus, the conclusions regarding the cumulative impact analysis and impact significance presented below are the same and apply to the Project or the Project with the East Site Hotel Option.

(1) Impact Analysis

Cumulative impact analysis addresses the impacts of known and anticipated development in the Project area in combination with the Project and the Project with the East Site Hotel Option, with respect to the anticipated amount, timing, and distribution of population, housing, and employment growth. The 123 related projects located in the City of Los Angeles and 27 related projects located in the City of West Hollywood are listed in Table III-1 of Chapter III, *Environmental Setting*, of this Draft EIR.

The calculation of the cumulative number of housing units, population, and employees attributable to the related projects is provided in Appendix L, Population, Housing and Employment Projection Documentation, of this Draft EIR. A summary of cumulative growth is shown in **Table IV.J-8**, *Total Cumulative Development*. Projections focus on the SCAG 2016-2040 RTP/SCS 2040 horizon year as opposed to the Project's 2027 buildout date. The 2040 horizon is the appropriate timeframe for evaluating cumulative impacts because the related projects represent a long-term development scenario for the City. SCAG projections incorporate regional policies and are based on long-term demographic trends that average out short-term variations, which may not be reflected in shorter-term 2027 projections.[35]

35 SCAG, 2016-2040 RTP/SCS, 2016, p. 13.

TABLE IV.J-8
TOTAL CUMULATIVE DEVELOPMENT

Development[a]	Population[b,c]	Housing Units[b]	Employment[b]
City of Los Angeles Only			
Related Projects	36,699	15,152	73,208
Project Buildout	2,433	1,005	206
Related Projects + Project Totals	**39,132**	**16,157**	**73,414**
Project with the East Site Hotel Option Buildout	2,140	884	445
Related Projects + Project with the East Site Hotel Option Totals	**38,839**	**16,036**	**73,653**
All Related Projects (Cities of Los Angeles and West Hollywood)[d]			
All Related Projects	38,208	16,092	76,146
Project Buildout	2,433	1,005	206
Related Projects + Project Totals	**40,641**	**17,097**	**76,352**
Project with the East Site Hotel Option Buildout	2,140	884	445
Related Projects + Project with the East Site Hotel Option Totals	**40,348**	**16,976**	**76,591**

[a] A list of the related projects is provided in Table III-1 of Chapter III of this Draft EIR. 123 projects are located within the City of Los Angeles, and 27 projects are located within the City of West Hollywood, which results in a total of 150 related projects.

[b] The calculations for housing, population, and employment are presented in Appendix L of this Draft EIR.

[c] The average household size in the City of Los Angeles is based on 2017 Census American Community Survey 5-Year Estimate data (2013–2017), www.census.gov/programs-surveys/acs/technical-documentation/table-and-geography-changes/2015/5-year.html, per correspondence with Jack Tsao, Housing Planner, Los Angeles Department of City Planning, July 31, 2019. The average household size in the City of West Hollywood is based on Southern California Association of Governments' 2019 Profiles Report for the City of West Hollywood.

[d] The estimates here account for all of the related projects, including the ones located within the City of West Hollywood.

SOURCE: ESA, 2020.

Table IV.J-9, *Cumulative Population, Housing, and Employment Impacts,* compares projected cumulative growth, inclusive of the Project, to the 2016-2040 RTP/SCS's 2040 horizon year projections for the City of Los Angeles. As shown below, related projects that are outside of the boundaries of the City of Los Angeles (e.g., the projects within the City of West Hollywood) are not included as the table below presents a comparison to SCAG projected growth for the City of Los Angeles. The related projects reflect a mix of development, including residential, office, hotel, and commercial uses.

TABLE IV.J-9
CUMULATIVE POPULATION, HOUSING AND EMPLOYMENT IMPACTS

	Cumulative Increase, including Proposed Project[a]	SCAG Projected Growth[b]	Cumulative Percentage of Growth
Project			
Population	39,132	600,207	6.5%
Households	16,157	286,628	5.6%
Employment	73,414	371,407	19.8%
Project with the East Site Hotel Option			
Population	38,839	600,207	6.5%
Households	16,036	286,628	5.6%
Employment	73,653	371,407	19.8%

[a] From Table IV.J-8.
[b] From Table IV.J-1.
SOURCE: ESA, 2020.

(a) Population

As indicated in Table IV.L-9, the cumulative population growth under the Project (39,132 persons) and the Project with the East Site Hotel Option (38,839 persons). Under both the Project and the Project with the East Site Hotel Option, the population growth would be approximately 6.5 percent of the population growth estimated in the SCAG projection for the City by the 2040 horizon year.

(b) Housing

As indicated in Table IV.L-9, the Project and related projects would result in the construction of approximately 16,157 dwelling units within the City, while the Project with the East Site Hotel Option and related projects would result in 16,036 dwelling units. Under both the Project and Project with the East Site Hotel Option, the dwelling units would be approximately 5.6 percent of Citywide projected housing growth by the year 2040.

(c) Employment

As indicated in Table IV.L-9, the Project and related projects would have approximately 73,414 employment opportunities in the City, while the Project with the East Site Hotel Option and related projects would have 73,653 employment opportunities. Under both the Project and the Project with the East Site Hotel Option, the employment opportunities would represent approximately 19.8 percent of the projected new jobs Citywide by 2040.

(d) Conclusion

As noted above, the projected population, household, and employment growth would be within the 2040 SCAG projections identified in the 2016-2040 RTP/SCS for the City. The increases in population (maximum of 6.5 percent based on the cumulative population growth under the Project and the Project with the East Site Hotel Option) and households (5.6 percent based on the cumulative housing growth under the Project and the Project with the East Site Hotel Option) show that the City is attracting relatively similar proportionate amounts of residential and housing growth in the area. Additionally, the total amount of development reflects the proportion of growth occurring in the City as a whole. The increase in housing stock in the City provides opportunities for residents to locate within an HQTA and within proximity to transit facilities, thereby reducing the demand for development in lower-density areas and achieving greater efficiency in the provision and use of services and infrastructure.

The additional employment opportunities would increase the number of jobs adjacent to residential areas and public transit, which would support City and regional policies intended to reduce VMT. The new jobs would bolster the local economy and bring new jobs to an area that is prime for employment growth. The related projects alone for the City would have a jobs/housing ratio of 4.832, which indicates the large amount of jobs that would be introduced to the City from the related projects. These growth trends indicate that the City's new developments are bringing more employment opportunities while improving its distribution of jobs and housing. The increase in employment also furthers SCAG and City goals of providing employment opportunities within an easily accessible employment center.

For these reasons, the Project's or the Project with the East Site Hotel Option's contribution to cumulative impacts would not be cumulatively considerable. As such, cumulative impacts on population and housing would be less than significant.

(2) Mitigation Measures

Cumulative impacts regarding induced substantial unplanned population growth were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Cumulative impacts regarding induced substantial unplanned population growth were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

IV. Environmental Impact Analysis

K.1 Public Services – Fire Protection

1. Introduction

This section analyzes the Project's potential construction and operational impacts on fire protection provided by the City of Los Angeles Fire Department (LAFD). The analysis addresses whether impacts to fire protection services, response times, emergency access, water infrastructure, and fire flow (i.e. water available for firefighting) would require the need for new or physically altered fire facilities, the construction of which could cause significant environmental impacts. The analysis is based, in part, on information provided by the LAFD[1], which is provided in Appendix M-1, and the Hollywood Center Utility Infrastructure Technical Report: Water, Wastewater and Energy (Utility Technical Report) prepared by KPFF Consulting Engineers, dated April 1, 2020, which is provided in Appendix P-1, of this Draft EIR.[2]

2. Environmental Setting

a) Regulatory Framework

(1) Federal

The Federal Occupational Safety and Health Administrations (OSHA) and California OSHA (Cal/OSHA) enforce the provisions of the Federal and State Occupational Safety and Health Acts, respectively, which collectively require safety and health regulations for construction under Part 1926 of Title 29 Code of Federal Regulations (CFR). The fire-related requirements of the federal Occupational Safety and Health Act are specifically contained in Subpart F, Fire Protection and Prevention, of Part 1926. Examples of general requirements related to fire protection and prevention include maintaining fire suppression equipment specific to construction on-site; providing a temporary or permanent water supply of sufficient volume, duration, and pressure; properly operating the on-site fire-

1 Ralph M. Terrazas, Fire Chief, and Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department (LAFD), correspondence dated October 30, 2018. Provided in Appendix M-1 of this Draft EIR.

2 KPFF Consulting Engineers, Hollywood Center Utility Infrastructure Technical Report: Water, Wastewater and Energy (Utility Technical Report), April 1, 2020. Provided in Appendix P-1 of this Draft EIR.

fighting equipment; and keeping storage sites free from accumulation of unnecessary combustible materials.

(2) State

(a) California Code of Regulations, Title 24

The California Code of Regulations (CCR) Title 24 (California Building Code [CBC]) is a compilation of building standards, including fire safety standards for residential and commercial buildings. CBC standards are based on building standards that have been adopted by state agencies without change from a national model code; building standards based on a national model code that have been changed to address particular California conditions; and building standards authorized by the California Legislature, not covered by the national model code. The California Fire Code is part of the CBC. Typical fire safety requirements of the California Fire Code include: the installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas. The California Fire Code applies to all occupancies in California, except where more stringent standards have been adopted by local agencies. Specific California Fire Code regulations have been incorporated by reference with amendments, in the Los Angeles Building Code, Fire Safety Regulations.

The LAFD participates in the California Fire Service and Rescue Emergency Mutual Aid System through which the California Governor's Office of Emergency Service (OES), Fire and Rescue Division is responsible for the development, implementation and coordination of the California Fire Service and Rescue Emergency Mutual Aid Plan (Mutual Aid Plan).[3] The Mutual Aid Plan outlines procedures for establishing mutual aid agreements at the local, operational, regional, and state levels, and divides the State into six mutual aid regions to facilitate the coordination of mutual aid. The LAFD is located in Region I. Through the Mutual Aid Plan, the OES is informed of conditions in each geographic and organizational area of the State, and the occurrence or imminent threat of disaster. All OES Mutual Aid Plan participants monitor a dedicated radio frequency for fire events that are beyond the capabilities of the responding fire department and provide aid in accordance with the management direction of the OES.

(b) California Constitution Article XIII, Section 35

Section 35 of Article XIII of the California Constitution at subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California

[3] Governor's Office of Emergency Services, Fire and Rescue Division, California Fire Service and Rescue Emergency Mutual Aid System, Mutual Aid Plan, revised December 2014.

Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal.App.4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including fire protection, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.[4] The *Hayward* ruling also concluded that "assuming the city continues to perform its obligations, there is no basis to conclude that the project will cause a substantial adverse effect on human beings" and the "need for additional fire protection services is not an environmental impact that CEQA requires a project proponent to mitigate."[5]

(c) California Vehicle Code

Section 21806 of the California Vehicle Code (CVC) pertains to emergency vehicles responding to Code 3 incident/calls.[6] This section of the CVC states the following:

> *Upon the immediate approach of an authorized emergency vehicle which is sounding a siren and which has at least one lighted lamp exhibiting red light that is visible, under normal atmospheric conditions, from a distance of 1,000 feet to the front of the vehicle, the surrounding traffic shall, except as otherwise directed by a traffic officer, do the following: (a)(1) Except as required under paragraph (2), the driver of every other vehicle shall yield the right-of-way and shall immediately drive to the right-hand edge or curb of the highway, clear of any intersection, and thereupon shall stop and remain stopped until the authorized emergency vehicle has passed. (2) A person driving a vehicle in an exclusive or preferential use lane shall exit that lane immediately upon determining that the exit can be accomplished with reasonable safety…. (c) All pedestrians upon the*

4 *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal.App.4th 833, 847.

5 *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal.App.4th 833, 843, 847.

6 A Code 3 response to any emergency may be initiated when one or more of the following elements are present: a serious public hazard, an immediate pursuit, preservation of life, a serious crime in progress, and prevention of a serious crime. A Code 3 response involves the use of sirens and flashing red lights.

highway shall proceed to the nearest curb or place of safety and remain there until the authorized emergency vehicle has passed.

(3) Local

(a) City of Los Angeles General Plan Framework

The General Plan Framework, originally adopted in December 1996 and re-adopted in August 2001, sets forth general guidance regarding land use issues for the entire City and defines citywide policies regarding land use, including public services. The fire protection service goals and objectives within the General Plan, Chapter 9, Infrastructure and Public Services, pertain to City responsibility and are not applicable to specific developments like the Project.

(a) General Plan Safety Element

The General Plan Safety Element, adopted on November 26, 1996, replaces the 1975 General Plan Safety Element and the 1979 Fire Protection and Prevention Element. It contains policies related to the City's response to hazards and natural disasters. The specific fire protection policy within the Safety Element that is applicable to the Project is as follows:

> **Policy 2.1.6:** Standards/fire. Continue to maintain, enforce and upgrade requirements, procedures and standards to facilitate more effective fire suppression. (All peak load water and other standards, code requirements [including minimum road widths, access, and clearances around structures] and other requirements or procedures related to fire suppression implement this policy.)

Accordingly, the LAFD and/or appropriate City agencies revise regulations or procedures to include the establishment of minimum standards for the location and expansion of fire facilities, based upon fire-flow requirements, intensity and type of land use, life hazard, occupancy, and degree of hazard, so as to provide adequate fire response.

(b) Hollywood Community Plan

The Hollywood Community Plan was adopted in 1988 and addresses growth and the arrangement of land uses within its boundaries through the year 2010.[7] The 1988 Hollywood Community Plan provides five policies and one objective regarding fire protection.[8] However, the policies do not pertain to private

7 City of Los Angeles Department of City Planning, Hollywood Community Plan, adopted December 13, 1988, pp. HO-4 and HO-5.

8 City of Los Angeles Department of City Planning, Hollywood Community Plan, adopted December 13, 1988.

developments and are developed for the City to maintain and evaluate the fire protection by LAFD.

(c) Los Angeles Municipal Code and Charter

As detailed in Chapter V, Article 7, Fire Protection and Prevention (Fire Code) of the Los Angeles Municipal Code (LAMC), which has been repealed and replaced by Ordinance No. 184,913[9], approved May 19, 2017, the LAFD Bureau of Fire Prevention and Public Safety is required to administer and enforce basic building regulations set by the State Fire Marshal. The Fire Code also provides regulations for the safeguarding of life and property from fire, explosion, panic, or other hazardous conditions, which may arise in the use or occupancy of buildings, structures, or premises. Construction of the Project would be in compliance with Fire and Building Code requirements. Construction managers would be trained in fire suppression and emergency response, and fire suppression equipment specific to construction would be maintained on-site. The Project's components, including doors, materials, walkways, stairwells, and elevators, would be designed to meet Fire Code requirements. Key regulations pertaining to the Project are discussed below.

Section 520 of the Los Angeles City Charter states that the LAFD shall have the power and duty to control and extinguish injurious or dangerous fires and remove that which is likely to cause those fires; enforce all ordinances and laws relating to the prevention or spread of fires, fire control, and fire hazards within the City; conduct fire investigations; and protect lives and property in case of disaster or public calamity. Additionally, LAMC Section 57.106.5.2 authorizes the Fire Chief to require drawings, plans, or sketches that may be necessary to identify: (1) occupancy access points; (2) devices and systems within the scope of Chief's Regulation No. 4; (3) utility controls; (4) stairwells; and (5) hazardous materials/waste. Furthermore, LAMC Section 57.107.7 requires that the installation, alteration, and major repair of the following shall be performed under permit of the Los Angeles Department of Building and Safety (LADBS): (1) LAFD communication systems; (2) building communication systems; (3) automatic elevators; (4) heliports and emergency helicopter landing facilities; (5) emergency power systems; (6) fire escapes; (7) private fire hydrants; (8) fire assemblies; (9) fire protective signaling systems; (10) pilot lights and warning lights for heat-producing equipment; (11) refrigerant discharge systems; (12) smoke detectors; (13) emergency smoke control systems; (14) automatic sprinkler systems; (15) standpipe systems; and (16) gas detection systems.

Generally, Section 57.118 of the Fire Code sets forth the services of the LAFD to perform fire/life safety plan review and fire/life safety inspection for new constructions. Section 57.118.1.1 of the Fire Code requires that all new high-rise

9 City of Los Angeles, Los Angeles Municipal Code, Ordinance No. 184,913, Section 57.507.3.1, Fire-Flow Requirements, approved May 10, 2017.

buildings greater than 75 feet in height (measured from the lowest point with fire access) must include fire/life safety reviews by the LADBS and LAFD. Under Section 57.4705.1.6, there must be at least one elevator, which shall be available for fire emergency medical services (EMS) and shall have its controls designed so that key switches located in the building control station/fire command center will recall said elevator or elevators to the designated main floors.

For high-rise buildings, Section 57.408 requires the preparation of an Emergency Plan that establishes dedicated personnel and emergency procedures to assist the LAFD during an emergency incident, and establishes a drill procedure to prepare for emergency incidents. The Emergency Plan would also establish an on-site emergency assistance center and establish procedures to be followed during an emergency incident. The Emergency Plan must be submitted to the LAFD for approval prior to implementation, and must be submitted annually (and revised if required by the LAFD).

Section 57.4704 requires that all smoke detectors must be maintained in dependable operating condition and tested every 6 months or as required by the Fire Chief. In addition, no person is permitted to use, maintain, or allow to exist any portable, fuel-burning, unvented room heater in any building classified as residential occupancy, or any compressed gases or liquefied flammable gases.

Section 57.507.3.1 addresses access, hydrants, fire-flow requirements, and response distances. Fire-flow is defined as the quantity of water available or needed for fire protection in a given area and normally measured in gallons per minute (gpm) as well as duration of flow. Fire-flow adequacy is determined by the type of land use with high-density land uses requiring higher flows from a greater number of hydrants. A minimum residual water pressure of 20 pounds per square inch (psi) is required to remain in the water system in addition to the required gpm water flow.

Section 57.507.3.2 determines fire hydrant spacing and hydrant type according to land use (Table 57.507.3.2). For industrial and commercial uses, one hydrant per 80,000 square feet of land is required with a 300-foot distance between hydrants. Furthermore, all first-story portions of a commercial building must be within 300 feet of an approved hydrant. Section 57.507.3.3 sets forth response distances to an LAFD station based on type of land use that if exceeded require the installation of an automatic fire sprinklers system (Table 57.507.3.3). The maximum response distance from an industrial and commercial development to a fire station is 1 mile for an Engine Company and 1.5 miles from a Truck Company.

(d) Propositions F and Q and Measure J

Proposition F, the City of Los Angeles Fire Facilities Bond, was approved by voters in November 2000. This bond authorized the issuance of $532.6 million of general obligation bonds to finance the construction and rehabilitation of fire stations and

animal shelters. Proposition F allocated $378.6 million to build 18 new or replacement/expanded fire/paramedic stations, one regional fire station and training facility, and one emergency air operations and helicopter maintenance facility, for a total of 20 Proposition F projects. As of January 2017, all of the proposed projects have been completed.[10]

Proposition Q, the Citywide Public Safety General Obligation Bond Program, was approved by voters in March 2002. Proposition Q allocated $600 million to renovate, improve, expand and construct police, fire, 911, and paramedic facilities. In March 2011, the program was expanded to include renovations to existing LAFD facilities throughout the City. A total of 80 renovation projects at LAFD facilities were scheduled. These renovation projects include the installation of diesel exhaust capture systems, upgrades to air filtration and electrical systems, re-roofing, remodeling, parking lot repair, painting, and other improvements. The fire renovation projects identified under this measure have been completed.[11]

Measure J, which was approved by voters at the November 7, 2006 General Election, is a charter amendment and ordinance that involves technical changes to Proposition F. Measure J allows new regional fire stations funded by Proposition F to be located in densely developed areas to be designed and built on one or more properties equaling less than 2 acres. Components of a regional fire station can be built on two or more sites within close proximity, or the facility can be designed to fit on a single site of less than 2 acres.

(e) Los Angeles Fire Department Strategic Plan 2018-2020

The Los Angeles Fire Department Strategic Plan 2018-2020 (LAFD's Strategic Plan) is a collaborative effort between LAFD staff, City leaders, and community members to accomplish the LAFD's organizational vision.[12] LAFD's Strategic Plan identifies five goals and corresponding strategic actions that will guide the LAFD for the next three years. The key goals include providing public safety and emergency service; embracing a healthy, safe, and productive work environment; capitalizing on advanced technology; enhancing LAFD sustainability and community resiliency; and increasing opportunities for personal growth and professional development.

10 LAFD, Los Angeles 2000 Prop F Fire Facilities Bond, Progress Report - Feb-March 2016.
11 City of Los Angeles, 2002 Proposition Q Citywide Safety Bond Program Progress Report – February/March 2016.
12 LAFD, Strategic Plan 2018-2020, 2018.

b) Existing Conditions

(1) Fire Protection Facilities

Fire prevention, fire suppression, life safety and emergency medical services within the City are provided by the LAFD. The LAFD is a full-spectrum life safety agency that serves a population of approximately four million people. The LAFD's estimated 3,246 uniformed personnel and 353 civilian support staff provide fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community service. Currently, there is an estimated total of 1,018 uniformed firefighters, including 270 serving as firefighters/paramedics, on-duty at 106 fire stations across the LAFD's 471-square-mile jurisdiction.[13]

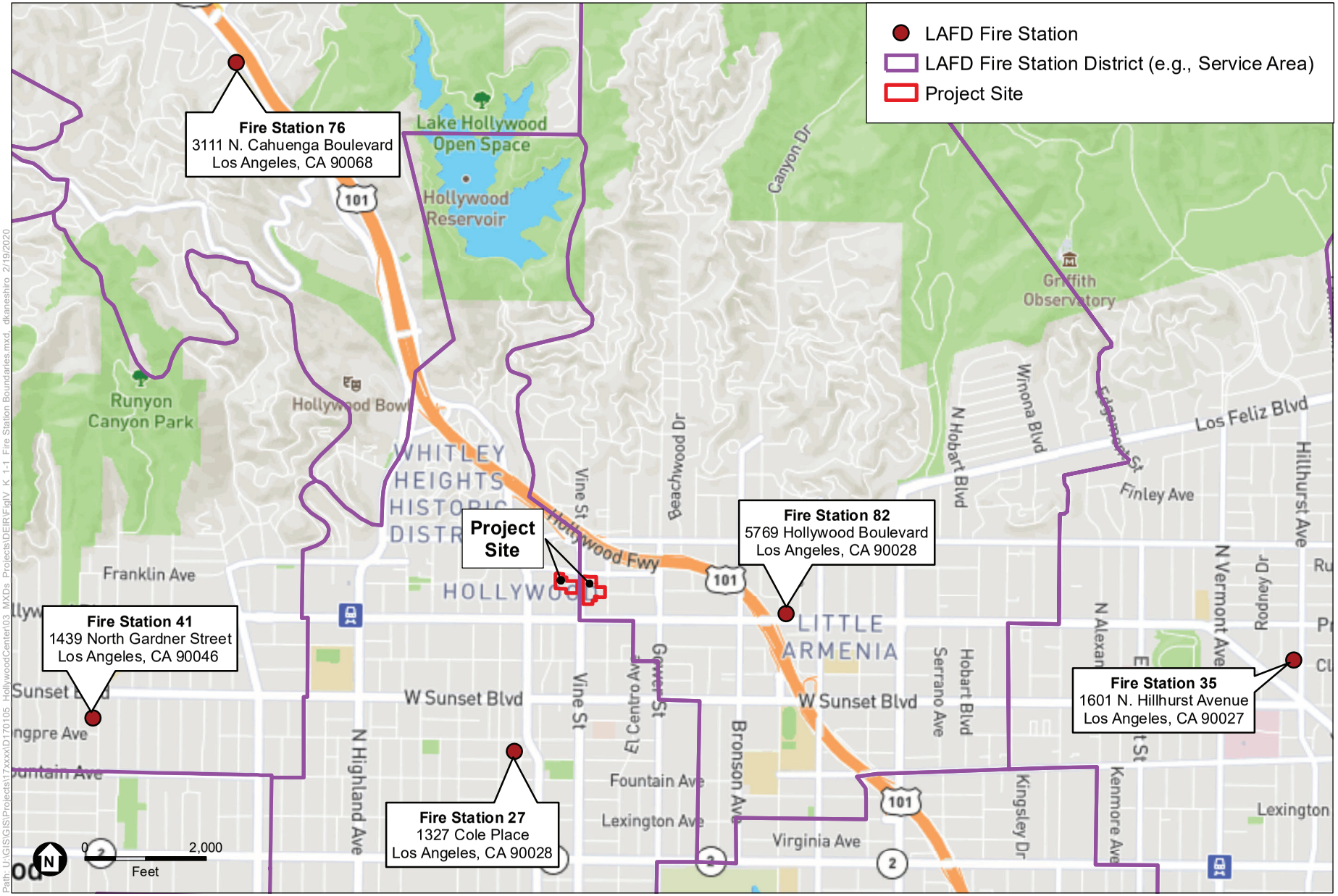
The LAFD emergency services are divided across four geographic bureaus, including Central, South, Valley, and West. The Project Site is located in LAFD's Operations West Bureau, stationed at Fire Station 82 in the Hollywood Community and comprised of Battalions 4, 5, and 9. The Operations West Bureau encompasses the western portion of Los Angeles and includes the communities of Bel Air/Holmby Hills, Brentwood, Cahuenga Pass, Hollywood, LAX/ARFF, LAX Area, Los Feliz, Mar Vista, Pacific Palisades, Palisades Highlands, Playa Vista, Sawtelle, Silver Lake, Venice, West Los Angeles, Westchester, and Westwood/UCLA.[14]

As shown in **Figure IV.K.1-1**, *Fire Station Boundaries*, there are five fire stations that provide primary fire protection services to the Project Site and surrounding area. **Table IV.K.1-1,** *Fire Stations Located in the Project Vicinity*, includes the location, distance/direction from the Project Site, average response times, and equipment for each of the fire stations.

As shown in Table IV.K.1-1, Fire Station 82 at 5769 W. Hollywood Boulevard is located nearest to the Project Site, with Fire Station No. 27 being incrementally farther (0.9 mile) using driving distance as a measurement. Per the City's ZIMAS website, Fire Station 82 is the first due fire station for the East Site, while Fire Station 27 is the first due station for the West Site. The other three stations named by LAFD that would provide support for fire protection services to the Project Site are Fire Stations 41, 76, and 35, located approximately 1.9 miles west, 2.3 miles northwest, and 2.7 miles east, respectively, of the Project Site.

13 LAFD, Department Overview – Our Mission, http://www.lafd.org/about/about-lafd/our-mission, accessed September 25, 2019.

14 LAFD, West Bureau, http://www.lafd.org/about/west-bureau, accessed March 6, 2020.



Path: U:\GIS\GIS\Projects\17xxxx\D170105_HollywoodCenter\03_MXDs_Projects\DEIR\FigIV_K.1-1_Fire Station Boundaries.mxd dkaneshiro 2/19/2020

SOURCE: Open Street Map 2017; City of Los Angeles Open Data: https://data.lacity.org/, Accessed January 2017; ESA 2018

Hollywood Center Project

Figure IV.K.1-1
Fire Station Boundaries

TABLE IV.K.1-1
FIRE STATIONS LOCATED IN THE PROJECT VICINITY

Fire Station No./ Location[a]	Driving Distance/ Direction from Project Site	Average Response Times[b,c,d]		Equipment
		EMS	Non-EMS	
Fire Station 82 5769 W. Hollywood Boulevard	0.7 miles east	6:24	6:12	Engine and Paramedic Rescue Ambulance
Fire Station 27 1327 N. Cole Avenue	0.9 miles southwest	6:16	5:52	Assessment Light Force Paramedic Rescue Ambulance BLS Rescue Ambulance Brush Patrol
Fire Station 76 3111 N. Cahuenga Boulevard	2.3 miles northwest[e]	7:41	7:35	Assessment Engine Paramedic Rescue Ambulance
Fire Station 41 1439 N. Gardner Street Los Angeles	1.9 miles west	6:59	7:14	Engine Paramedic Rescue Ambulance Brush Patrol
Fire Station 35 1601 N. Hillhurst Avenue	2.7 miles east	6:04	5:50	Assessment Light Force Paramedic Rescue Ambulance BLS Rescue Ambulance Brush Patrol

[a] LAFD Fire Station 52 is located at 4957 Melrose Ave, Los Angeles, CA 90029, approximately 2.4 miles southwest of the Project Site. However, Fire Station 52 was not identified by LAFD in their correspondence as a station that would provide initial response to the Project Site.

[b] LAFD, FireStatLA, http://www.lafd.org/fsla/stations-map, accessed March 7, 2019.

[c] Average Response times from January through December of 2018 provide the most accurate annual average. Average Response Times include call processing, turn out, and travel time. The Citywide average response time from January through December 2018 is 6:30 for EMS and 6:17 for non-EMS.

[d] Non-EMS = Fire and other services. EMS = Emergency Medical Services.

[e] The LAFD letter correspondence dated October 30, 2018 provided a driving distance of 0.9-mile from Fire Station 76 to the Project Site. However, based on Google Maps, the driving distance between Fire Station 76 and the Project Site is approximately 2.3 miles, and is reflected in this table.

SOURCE: Ralph M. Terrazas, Fire Chief, and Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, LAFD, correspondence dated October 30, 2018. Provided in Appendix M-1 of this Draft EIR. LAFD website, FireStatLA, http://www.lafd.org/fsla/stations-map?year=2018, accessed March 11, 2019.

(2) Response Distance

According to the City's Fire Code (LAMC Section 57.507.3.3), the first-due Engine Company should be within 1 mile of the Project Site and the first-due Truck Company should be within 1.5 miles. As indicated in Table IV.K.1-1, Fire Station 82, which is the first due-in station with an Engine Company, is located 0.7 miles from the Project Site. Fire Station 27, the closest station with a Truck Company,

consists of the Assessment Light Force, which is a Truck Company run with a single Engine in a configuration, and is located 0.9 miles from the Project Site.[15]

(3) Response Time

Specific response times for the stations for January through December 2018 are included in Table IV.K.1-1. Fire Station 82, the closest station to the Project Site, had an average response time of 6:24 and 6:12 minutes for EMS and non-EMS incidents, respectively. Fire Station 27 had an average response time of 6:16 and 5:52 minutes for EMS and non-EMS incidents, respectively. Fire Station 76 had an average response time of 7:41 and 7:35 minutes for EMS and non-EMS incidents, respectively. Fire Station 41 had an average response time of 6:59 and 7:14 minutes for EMS and non-EMS incidents, respectively. Fire Station 35 had an average response time of 6:04 and 5:50 minutes for EMS and non-EMS incidents, respectively. The Citywide average response times between January and December 2018 were 6:30 and 6:17 minutes for EMS and non-EMS incidents, respectively.

These response times are provided for information purposes since the LAFD has not established response time standards for emergency response. Roadway congestion, intersection level of service (LOS), weather conditions, and construction traffic along a response route can affect response time. Generally, multi-lane arterial roadways allow emergency vehicles to travel at higher rates of speed and permit other traffic to maneuver out of a path of an emergency vehicle. Additionally, the LAFD, in collaboration with Los Angeles Department of Transportation (LADOT), has developed a Fire Preemption System (FPS), a system that automatically turns traffic lights to green for emergency vehicles traveling along designated City streets to aid in emergency response.[16] The City has over 205 miles of major arterial routes that are equipped with FPS.[17]

According to the LAFD, although response time is considered to assess the adequacy of fire protection services, it is one factor among several that LAFD utilizes in considering its ability to respond to fires and life and health safety emergencies, including required fire flow, response distance from existing fire stations, and the LAFD's judgement for needs in an area. If the number of incidents in a given area increases, it is the LAFD's responsibility to assign new staff and equipment, and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. In conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling, the City

15 LAFD, Apparatus, https://www.lafd.org/about/about-lafd/apparatus, accessed March 11, 2019.
16 Los Angeles Department of Transportation, Los Angeles Signal Synchronization Fact Sheet, February 14, 2016.
17 LAFD, Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles, Bulletin No. 133, October 2008.

has and will continue to meet its legal obligations to provide adequate public safety services, including fire protection.

The LAFD has recently taken a number of steps to improve their related systems, processes and practices, which in turn serve to reduce response times. Upgrades recently completed or pending include installation of automated vehicle locating systems on all LAFD apparatus; replacement of fire station alerting systems that control fire station dispatch audio, signal lights, and other fire station alerting hardware and software; and development of a new computer-aided dispatch system to manage fire and emergency medical service incidents from initial report to conclusion of an incident.[18]

(4) Emergency Access

The Project Site is accessible by emergency vehicles from a number of major roadways (e.g., Hollywood Boulevard, Vine Street) serving the Project Site. Emergency access to the Project Site is provided directly via Ivar Avenue and Argyle Avenue, along with the Yucca Street driveway, which provide access to the Capitol Records Building. The closest fire station with an Engine Company, Fire Station 82, has access to the Project Site from the east via Hollywood Boulevard to Argyle Avenue, or from Hollywood Boulevard to Ivar Avenue. The closest station with a Truck Company, Fire Station 27, has access to the Project Site from the southwest via Ivar Avenue, or from Hollywood Boulevard to Argyle Avenue.

(5) Water Infrastructure/Fire Flow for Firefighting Services

In general, fire flow requirements are closely related to land use as the quantity of water necessary for fire protection varies with the type of development, life hazard, type of occupancy, and degree of fire hazard. Fire flow requirements vary from 2,000 gpm in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas with a minimum residual water pressure of 20 psi.[19]

There are several existing public fire hydrants in the immediate vicinity of the Project Site.[20] Four hydrants are located along Yucca Street: one at the intersection of Yucca Street and Ivar Avenue; two at the intersection of Yucca Street and Vine Street; and one at the intersection of Yucca Street and Argyle Street. One fire hydrant is located on Ivar Street approximately 410 feet south of Yucca Street. Two hydrants are located on Vine Street approximately 315 and 390 feet south of Yucca Street. One last hydrant on Argyle Avenue is located approximately 375 feet south of Yucca Street.

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18 LAFD, A Safer City Strategic Plan, 2018-2020, 2018.

19 City of Los Angeles, Los Angeles Municipal Code, Ordinance No. 182,822, Section 57.507.3.1, Fire-Flow Requirements.

20 KPFF Consulting Engineers, Utility Technical Report, April 1, 2020, p. 8. Provided in Appendix P-1 of this Draft EIR.

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to fire protection services if it would:

Threshold (a): 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.

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions. The factors to evaluate fire protection services impacts include:

- A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service.

b) Methodology

Fire protection needs relate to the size of the population and geographic area served, the number and types of calls for service, and the characteristics of the community and the Project. Changes in these factors resulting from the Project may increase the demand for services. The LAFD evaluates the demand for fire prevention and protection services on a project-by-project basis, including review of the Project's emergency features, to determine if the Project would require additional equipment, personnel, new facilities, or alterations to existing facilities. Beyond the standards included in the Fire Code, consideration is given to the size of the Project, uses proposed, fire flow necessary to accommodate the Project, distance of engine and truck companies (the distance standard is 1 mile for an Engine Company and 1.5 miles for a Truck Company) from the Project Site, fire hydrant sizing and placement standards, access, and the Project's potential to use or store hazardous materials. Based on these factors, a determination is made as to whether the LAFD would require the addition of a new or physically altered facility to maintain acceptable service levels, the construction of which could result in a potentially significant environmental impact. As part of the analysis, the LAFD was consulted and its responses were incorporated regarding the Project.

c) Project Design Features

Refer to Project Design Features TRAF-PDF-2 (Construction Traffic Management Plan) and TRAF-PDF-3 (Construction Worker Parking Plan) in Section IV.L, *Transportation,* of this Draft EIR. No additional fire protection-related Project Design Features are applicable to the Project.

d) Analysis of Project Impacts

The Project and the Project with the East Site Hotel Option would include the same access, circulation, and supporting fire protection features, as described below. Accordingly, impacts under Threshold (a) would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the impact analysis, impact significance, and mitigation measures presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

Threshold (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?

(1) Impact Analysis

(a) Construction Impacts

Fires associated with construction activities could be caused by exposure of combustible materials, such as wood, plastics, sawdust, coverings and coatings, to heat sources, including machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings. However, in compliance with OSHA, Fire Code, and Building Code requirements, construction managers and personnel would be trained in fire prevention and emergency response. Fire suppression equipment specific to construction would be maintained on-site. Additionally, Project construction would comply with applicable existing codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials.

Project construction activities could also potentially affect emergency response times and emergency access to the Project Site and the vicinity due to Project construction traffic and temporary street closures. A Construction Traffic Management Plan (Project Design Feature TRAF-PDF-2) will be implemented to minimize disruptions to through traffic flow and maintain emergency vehicle access

to the Project Site and neighboring land uses. As described in Project Design Feature TRAF-PDF-2, a detailed Construction Traffic Management Plan will include, but not be limited to, a traffic control plan to route vehicular traffic, bicyclists, and pedestrians around potential closures; ensure that access will remain unobstructed for land uses in proximity to the Project Site; and coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses and residences. Additionally, as part of a Construction Worker Parking Plan (Project Design Feature TRAF-PDF-3), construction worker parking would identify alternate parking location(s) and the method of transportation to and from the Project Site.

The Project Site is largely available to access from the adjacent roadways. Emergency response vehicles can use a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Although minor traffic delays due to temporary lane closures needed to facilitate specific construction activities could occur, particularly during the construction of utilities and street improvements, impacts to fire protection services would be considered less than significant for the following reasons:

1. Emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the LAPD and LAFD (refer to Project Design Feature TRAF-PDF-2 in Section IV.L, *Transportation*, of this Draft EIR);

2. Construction impacts are temporary in nature and do not cause lasting effects; and

3. Partial lane closures, if determined to be necessary, would not significantly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic, in accordance with Section 21806 of the CVC. Additionally, if there are partial closures to streets surrounding the Project Site, flagmen would be used to facilitate the traffic flow until such temporary street closures are complete.

Therefore, Project construction would not result in substantial adverse impacts to emergency response times and emergency access**.**

Based on the above, Project or Project with the East Site Hotel Option construction would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. Impacts would be less than significant.

(b) Operational Impacts

The analysis of the Project's potential operational impacts on LAFD services addresses potential impacts associated with LAFD facilities and equipment, response distance and emergency access, and the ability of the fire water infrastructure system to provide the necessary fire flows.

(i) Facilities and Equipment

Fire Station 27 is the first due-in station to the West Site. Fire Station 82 is located closest in driving distance to the East Site (0.7 miles east of the Project Site) and would be the first station to respond to an emergency on the East Site. Additional back-up response to the Project Site would be provided by Fire Stations 41, 76, and 35, in order of increasing driving distance from the Project Site. As shown in Table IV.K.1-1, Fire Station 27 at 0.9 miles (driving distance) would meet the LAFD distance standard to the Project Site of 1.5 miles for a Truck Company. Fire Station 82 at 0.7 miles (driving distance) would meet the LAFD distance standard to the Project Site of 1 mile for an Engine Company.

As discussed in Section IV.J, *Population and Housing*, of this Draft EIR, the Project would result in an estimated population increase of 2,433 persons and 206 employees. The Project with the East Site Hotel Option would result in an estimated population increase of 2,140 persons and 445 employees. Thus, the Project and the Project with the East Site Hotel Option would increase density of the Project Site and increase the Project's Site's demand for fire protection services compared to existing conditions.

The Project would comply with the applicable OSHA, Building Code, Fire Code, other LAMC, and LAFD requirements, including: the provision of fire resistant doors, materials, walkways, stairwells, and elevator systems (including emergency and fire control elevators); installation of a fire sprinkler suppression system, smoke detectors, signage, fire alarms, building emergency communication systems, smoke control systems; implementation of an Emergency Safety Plan; compliance with LAFD fire apparatus and personnel access requirements; and water systems and roadway improvements improved to the satisfaction of the LAFD. In addition, the LAFD recommended a variety of fire prevention and protection features, including installation of Knox Boxes, building identification, emergency access lanes, building setbacks, and a required Fire Annunciator panel or Fire Control Room. Compliance with applicable Los Angeles Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit.

Compliance with applicable regulatory requirements, including LAFD's fire/life safety inspection for new construction projects and LAFD's recommendations for

fire prevention and protection described in the above paragraph,[21] would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment without creating the need for new or expanded fire facilities.

(ii) Response Distance and Emergency Access

Pursuant to LAMC Section 57.507.3.3, the required response distance for the Project Site is 1 mile to a fire station with an engine company and 1.5 miles to a fire station with a truck company. As discussed above, Fire Station 27, the closest station with a Truck Company (located 0.9 miles from the West Site), runs in a configuration called an Assessment Light Force, which includes an Aerial Ladder Fire Engine and a single Engine. Fire Station 82, which is the first due-in station with an Engine Company, is located 0.7 miles from the East Site. Therefore, the Project would fall within the LAFD's maximum prescribed response distances.

As described in Chapter II, *Project Description*, of this Draft EIR, vehicular access to the Project Site, including access for emergency vehicles, would be provided via Ivar Avenue, Yucca Street, and Argyle Avenue. Operation of the Project would not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency vehicle access to the Project Site and in the Project vicinity. As such, emergency access to the Project Site would be maintained at all times.

It is acknowledged that the Project would increase traffic on surrounding roadways. However, the area surrounding the Project Site includes an established street system, consisting of freeways, primary and secondary arterials, and collector and local streets, which provide regional, sub-regional, and local access and circulation within the local Project vicinity. Based on the Project Site's location within a highly urbanized areas of the City, the streets surrounding the Project Site were designed as standard streets in terms of pavement width and thickness, curb and gutter, and horizontal and vertical curvature. Therefore, the street system surrounding the Project Site is not considered substandard. Also, emergency response is routinely facilitated, particularly for high priority calls, through the use of sirens to clear a path of travel (including bypassing of signalized intersections), driving in the lanes of opposing traffic pursuant to California Vehicle Code Section 21806 and multiple station response. In addition, because of the grid pattern of the local street system and the proximity to multiple freeways, each of the fire stations that serves the Project Site have multiple routes available to respond to emergency calls at the Project Site. Furthermore, the Project's driveways and internal circulation would be designed to incorporate all applicable City Building Code and Fire Code requirements regarding Project Site access, including providing adequate

[21] Ralph M. Terrazas, Fire Chief, and Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, LAFD, correspondence dated October 30, 2018. Provided in Appendix M-1 of this Draft EIR.

emergency vehicle access. Compliance with applicable Los Angeles Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. Therefore, based on the considerations above, despite the Project increase in traffic, the Project would not significantly impair the LAFD from responding in a timely manner to emergencies at the Project Site or the surrounding area.

(iii) Fire Flow

As described in Section IV.N.2, *Water Supply*, of this Draft EIR, domestic and fire water service to the Project Site would be supplied by the Los Angeles Department of Water and Power (LADWP). The LAFD has determined that the required fire-flow for the Project, which falls within the industrial and commercial category, would be from 6,000 to 9,000 gpm (total) from four to six fire hydrants flowing simultaneously with a residual water pressure of 20 psi.[22] The Information of Fire Flow Availability Request (IFFAR), provided in Exhibit 2 of the Utility Technical Report, shows that the existing infrastructure (six of the nearby existing hydrants) would be able to deliver a fire flow of 9,000 gpm, which would be adequate to meet the flow required for the Project pursuant to LAMC Section 57.507.3.[23] Based on the Utility Technical Report prepared for the Project, the four Service Advisory Reports (SARs) for the Project Site determined that the existing public water infrastructure could meet the 20 psi requirement for the surrounding public hydrants and could meet the demands of the Project. The results of the SARs are summarized below:[24]

- West Site
  - The SAR for the domestic and fire water service off Vine Street shows that a static pressure of 62 psi and a flow of up to 2,500 gpm can be delivered to the Project Site with a residual pressure of 61 psi.
  - The SAR for the redundant fire water service off Ivar Street shows that a static pressure of 55 psi and a flow of up to 2,500 gpm can be delivered with a residual pressure of 54 psi.

22 Ralph M. Terrazas, Fire Chief, and Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, LAFD, correspondence dated October 30, 2018. Provided in Appendix M-1 of this Draft EIR.

23 KPFF Consulting Engineers, Utility Technical Report, April 1, 2020, p. 8. Provided in Appendix P-1 of this Draft EIR.

24 KPFF Consulting Engineers, Utility Technical Report, April 1, 2020, pp. 8 and 9. Provided in Appendix P-1 of this Draft EIR.

- East Site
  - The SAR for the domestic and fire water service off Vine Street shows that a static pressure of 65 psi and a flow of up to 2,500 gpm can be delivered with a residual pressure of 61 psi.
  - The SAR for the redundant fire water service off Argyle Street shows that a static pressure of 56 psi and a flow of up to 2,500 gpm can be delivered with a residual pressure of 37 psi.

Therefore, the Project would comply with applicable regulatory requirements of the Fire Code, and development plans would be subject to review and approval by the LAFD.

(iv) Conclusion

Based on the above, the Project or the Project with the East Site Hotel Option operation would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. Impacts would be less than significant.

(2) Mitigation Measures

Impacts regarding fire protection services were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding fire protection services were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

The Project and the Project with the East Site Hotel Option would include the same access, circulation, and supporting fire protection features and result in less-than-significant Project-level fire protection services impacts. Accordingly, cumulative impacts would be the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the cumulative impact analysis and impact significance for the Project presented below are the same and also apply to the Project with the East Site Hotel Option.

(1) Impact Analysis

Impacts to LAFD services and facilities for each of the related projects would be addressed as part of each related project's development review process

conducted by the City. Each related project would be subject to the City's routine permitting process, which would include a review by the LAFD to ensure that sufficient measures are implemented to reduce potential impacts to fire protection services.

Chapter III, *Environmental Setting*, of this Draft EIR, identifies 150 related projects, 123 of which are located within the City and within the service areas of the LAFD. The remaining 27 related projects are located within the City of West Hollywood and are, therefore, not considered in this cumulative analysis as the Project would not contribute to the use of fire protection services provided outside of the City. As discussed in Chapter III, the projected growth reflected by the related projects is a conservative assumption as some of the related projects may not be built out by 2025 (i.e., the earliest possible Project buildout year), may never be built, or may be approved and built at reduced densities and some involve replacement of existing uses which require LAFD services. To provide a conservative forecast, the future baseline forecast assumes that the related projects would be fully built out by 2025, unless otherwise noted.

Of the 123 projects located within the City, 114 are located within the fire station service areas of the same five LAFD Fire Stations that would serve the Project (e.g., Fire Stations 82, 27, 76, 41, and 35) as shown in **Table IV.K.1-2**, *Related Projects Served by the Same LAFD Fire Stations as the Project*.[25] Of these 114 related projects, 100 would be served by the same first due fire stations for the Project (Fire Station 27 for the West Site and Fire Station 82 for the East Site).

TABLE IV.K.1-2
RELATED PROJECTS SERVED BY THE SAME LAFD FIRE STATIONS AS THE PROJECT

No.[a]	Address	Primary Fire Station
1	6230 W. Yucca Street	82
2	1718 N. Vine Street	82
3	1800 N. Argyle Avenue	82
4	6220 W. Yucca Street	82
5	6225 W. Hollywood Boulevard	82
6	6200 W. Hollywood Boulevard	27
7	6381 W. Hollywood Boulevard	27
8	6140 Hollywood Boulevard	82

[25] Related project numbers 95, 97, 107, 108, 114, 116, 117, 119, and 122 within the City of Los Angeles are not primarily serviced by the same five stations that would serve the Project Site. Related project numbers 95, 97, 107, 108, 114, and 117 are primarily serviced by Fire Station No. 52. Related project numbers 116 and 119 are primarily serviced by Fire Station No. 61. Related project number 122 is primarily serviced by Fire Station No. 86. Related project number 123, NBC Universal, is located within the City of Los Angeles, but is served by both Fire Station 76 (which would serve the Project Site) and the Los Angeles County Fire Department.

TABLE IV.K.1-2
RELATED PROJECTS SERVED BY THE SAME LAFD FIRE STATIONS AS THE PROJECT

No.[a]	Address	Primary Fire Station
9	1601 N. Vine Street	27
10	6100 W. Hollywood Boulevard	82
11	1723 N. Wilcox Avenue	27
12	1717 N. Wilcox Avenue	27
13	6436 W. Hollywood Boulevard	27
14	1546 N. Argyle Avenue	27
15	1540 N. Vine Street	27
16	1615 N. Cahuenga Boulevard	27
17	1921 N. Wilcox Avenue	27
18	6506 Hollywood Boulevard	27
19	6523 W. Hollywood Boulevard	27
20	6417 W. Selma Avenue	27
21	6421 W. Selma Avenue	27
22	6421 W. Selma Avenue	27
23	1525 N. Cahuenga Boulevard	27
24	6250 Sunset Boulevard	27
25	6201 W. Sunset Boulevard	27
26	1719 Whitley Street	27
27	6516 W. Selma Avenue	27
28	6230 W. Sunset Boulevard	27
29	6409 W. Sunset Boulevard	27
30	1541 N. Wilcox Avenue	27
31	6200 W. Sunset Boulevard	27
32	6121 W. Sunset Boulevard	27
33	1600 N. Schrader Boulevard	27
34	6611 W. Hollywood Boulevard	27
35	6608 W. Hollywood Boulevard	27
36	6400 W. Sunset Boulevard	27
37	6050 Sunset Boulevard	27
38	1717 N. Bronson Avenue	82
39	6650 W. Franklin Avenue	27
40	6007 Sunset Boulevard	82
41	1360 N. Vine Street	27

TABLE IV.K.1-2
RELATED PROJECTS SERVED BY THE SAME LAFD FIRE STATIONS AS THE PROJECT

No.[a]	Address	Primary Fire Station
42	6322 DeLongpre	27
43	1400 N. Cahuenga Boulevard	27
44	1718 N. Las Palmas Avenue	27
45	5939 W. Sunset Boulevard	82
46	1603 N. Cherokee Avenue	27
47	1749 N. Las Palmas Avenue	27
48	1341 Vine Street	27
49	1313 N. Vine Street	27
50	5901 W. Sunset Boulevard	82
51	1601 N. Las Palmas Avenue	27
52	1824 N. Highland Avenue	27
53	1311 Cahuenga Boulevard	27
54	6758 W. Yucca Street	27
55	6751 Hollywood Boulevard	27
56	1841 N. Highland Avenue	27
57	1915 Highland Avenue	27
58	1310 N. Cole Avenue	27
59	6757 W. Hollywood Boulevard	27
60	6701 W. Sunset Boulevard	27
61	5750 W. Hollywood Boulevard	82
62	5800 W. Sunset Boulevard	82
63	1610 N. Highland Avenue	27
64	1133 N. Vine Street	27
65	1149 N. Gower Street	27
66	Over 101 Freeway between Hollywood Boulevard and Santa Monica Boulevard	82
67	1717 Gramercy Place	82
68	1411 N. Highland Avenue	27
69	5600 W. Hollywood Boulevard	82
70	5606 Harold Street	82
71	5632 W. De Longpre Avenue	82
72	7046 Hollywood Boulevard	41
73	5627 Fernwood Avenue	82
74	1233 N. Highland Avenue	27

TABLE IV.K.1-2
RELATED PROJECTS SERVED BY THE SAME LAFD FIRE STATIONS AS THE PROJECT

No.[a]	Address	Primary Fire Station
75	1745 N. Western Avenue	82
76	5500 W. Hollywood Boulevard	82
77	5500 W. Hollywood Boulevard	82
78	2580 Cahuenga Boulevard	76
79	1657 N. Western Avenue	82
80	5525 W. Sunset Boulevard	82
81	6300 W. Romaine Street	27
82	5520 W. Sunset Boulevard	82
83	1868 N. Western Avenue	82
84	6677 W. Santa Monica Boulevard	27
85	NWC Sunset & Western	82
86	1118 N. McCadden	27
87	6601 W. Romaine Street	27
88	956 N. Seward Street	27
89	959 N. Seward Street	27
90	7107 W. Hollywood Boulevard	41
91	7120 W. Sunset Boulevard	41
92	5420 W. Sunset Boulevard	82
93	901 N. Vine Street	27
94	1350 N. Western Avenue	82
96	6901 W. Santa Monica Boulevard	27
98	6914 W. Santa Monica Boulevard	27
99	7219 W. Sunset Boulevard	41
100	7300 W Hollywood Boulevard	41
101	927 N. Highland Avenue	27
102	7007 W. Romaine Avenue	27
103	859 N. Highland Avenue	27
104	733 N. Hudson Avenue	27
105	712 N. Wilcox Avenue	27
106	707 N. Cole Avenue	27
109	926 Sycamore Avenue	27
110	936 N. La Brea Avenue	41
111	925 N. La Brea Avenue	41

TABLE IV.K.1-2
RELATED PROJECTS SERVED BY THE SAME LAFD FIRE STATIONS AS THE PROJECT

No.[a]	Address	Primary Fire Station
112	904 N. La Brea Avenue	41
113	2864 N. Cahuenga Boulevard	27
115	7510 W. Sunset Boulevard	41
118	4900 W. Hollywood Boulevard	35
120	1300 N. Vermont Avenue	35
121	Universal Hilton	76
123	NBC Universal[b]	76

[a] This table corresponds with map numbers on Figure III-1 provided in Chapter III, *Environmental Setting*, of this Draft EIR.

[b] Related Project number 123 is served by both LAFD Station No. 76 and the Los Angeles County Fire Department.

SOURCE: ESA, 2019.

(a) Construction Impacts

As with the Project, each related project would have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings, and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions, in combustible materials and coatings, and lighted cigarettes. However, similar to the Project, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the safety and health regulations for construction established by OSHA. Additionally, in accordance with the provisions established by OSHA for emergency response and fire safety operations, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site. Construction of the related projects would also occur in compliance with applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials.

In the event that Project construction occurs concurrently with related projects in proximity to the Project Site, specific coordination among these multiple construction sites would be required and implemented through the Project's Construction Traffic Management Plan, which would ensure that emergency access and traffic flow are maintained on adjacent rights-of-way. Since the Project would not require substantial narrowing of adjacent public rights-of-way that may be hazardous to roadway travelers, the Project would not have significant impacts on access and safety. Similar to the Project, each related project would implement

similar design features during construction and would be subject to the City's routine construction permitting process, which includes a review by LAFD to ensure that sufficient fire safety measures are implemented to reduce potential impacts to fire protection services. Furthermore, construction-related traffic generated by the Project and related projects would not significantly impact LAFD response times within the Project Site vicinity as drivers of fire and emergency vehicles have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes opposing traffic, pursuant to CVC Section 21806. Finally, the Project in and of itself would not cause a significant impact to fire protection services during construction.

Based on the above, the Project or the Project with the East Site Hotel Option's contribution to cumulative construction impacts would not be cumulatively considerable. As such, cumulative impacts on fire protection services would be less than significant.

(b) Operational Impacts

Similar and in addition to the Project, the increase in development and service population from the related projects would generate the need for additional fire protection and EMS from the fire stations identified above.

As stated by LAFD, the development of the Project and the related projects may result in the need for increased staffing for existing facilities, additional fire protection facilities, and relocation of present fire protection facilities.[26] With regard to facilities and equipment, similar to the Project, the related projects would be required to implement all applicable Building Code and Fire Code requirements regarding structural design, building materials, site access, fire-flow, storage and management of hazardous materials, and alarm and communications systems. Compliance with applicable Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, prior to the issuance of a building permit. Compliance with applicable regulatory requirements would ensure that adequate fire prevention features would be provided and reduce demand on LAFD facilities and equipment. As with the Project, other related projects may also include the installation of automatic fire sprinklers to enhance fire safety that would further reduce the demand placed on the LAFD facilities and equipment. The Project, as well as the related projects, 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 fire station facilities and related staffing, as deemed appropriate by the City. Furthermore, over time, LAFD would continue to monitor population growth and

[26] Ralph M. Terrazas, Fire Chief, and Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, LAFD, correspondence dated October 30, 2018. Provided in Appendix M-1 of this Draft EIR.

land development throughout the City and identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction, which may become necessary to achieve the required level of service.

With regard to response distance, given that the related projects are generally located within an urban area, each of the related projects within the geographic scope would likewise be developed within urbanized locations serviced by one or more existing fire stations. Additionally, in accordance with Fire Code requirements, if a related project would not be within the acceptable distance from a fire station, that related project would be required to install an automatic fire sprinkler system to comply with response distance requirements. Similarly, as with the Project, the related projects would be required to comply with all applicable Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review prior to the issuance of a building permit.

With regard to response times, the Project and related projects would introduce new uses that would generate additional traffic within the boundaries of the fire stations, as defined in Figure IV.K.1-1, that would serve the Project Site. Traffic from the Project and related projects has the potential to increase emergency vehicle response times due to travel time delays caused by the additional traffic. However, as with the Project, related projects are expected to include design features and mitigation measures that would serve to reduce traffic impacts. Furthermore, as previously stated, emergency response vehicles can use a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, despite the cumulative increase in traffic, the Project and related projects would not significantly impair the LAFD from responding to emergencies at the Project Site or the surrounding area.

With regard to cumulative impacts on fire protection, consistent with *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate fire protection service is the responsibility of the City. Through the City's regular budgeting efforts, LAFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time, as appropriate.[27] LAFD has no known or proposed plans to expand fire facilities or construct new facilities in the Community Plan area. However, if LAFD determines that new facilities are necessary at some point in the future, such

[27] City of Los Angeles, Budget for the Fiscal Year 2017-18, modified and adopted by City Council on May 24, 2017.

facilities (1) would occur where allowed under the designated land use, (2) would be expected to be located on parcels that are infill opportunities on lots that are typically between approximately 0.5 to 2 acres in size (such as the five stations identified as serving the Project Site), and (3) would likely qualify for a Categorical Exemption under CEQA Guidelines Section 15301 or 15332 or Mitigated Negative Declaration and would not be expected to result in significant impacts.[28] Further analysis, including a specific location for a new fire station or expansion or alteration of the existing fire stations which would service the Project Site and the related projects' sites, would be speculative and, therefore, beyond the scope of this Draft EIR.

Based on the above, the Project or the Project with the East Site Hotel Option's contribution to cumulative operational impacts would not be cumulatively considerable. As such, cumulative impacts on fire protection services would be less than significant.

(2) Mitigation Measures

Cumulative impacts regarding fire protection services were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts with regard to fire protection services were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

[28] Although an EIR was prepared for the construction of Fire Station 39, the EIR concluded there would be no significant impacts; City of Los Angeles, Notice of Determination for Van Nuys Fire Station 39 Project, July 1, 2016.

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IV. Environmental Impact Analysis

K.2 Public Service – Police Protection

1. Introduction

This section of the Draft EIR describes existing police protection services within the Project area and analyzes potential impacts on police services that could occur due to construction and operation of the Project. The analysis focuses on the City of Los Angeles Police Department (LAPD) facilities that currently serve the Project Site and the ability of the LAPD to provide police protection services to the Project. The analysis is based, in part, on information provided by the LAPD.[1] This information includes statistical data regarding police protection facilities, services, and response times, and is included in Appendix M-2, of this Draft EIR. Additional information included in this analysis is also based on the California Vehicle Code (CVC), Los Angeles General Plan Framework, City of Los Angeles Charter, Administrative, and Municipal Codes, Hollywood Community Plan, the LAPD crime control model computer statistics (COMPSTAT) database, and other data available on the LAPD website.

2. Environmental Setting

a) Regulatory Framework

(1) Federal

No federal regulations are relevant to the thresholds discussed below.

(2) State

(a) California Constitution Article XIII, Section 35

Section 35 of Article XIII of the California Constitution at subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-

[1] Michael R. Moore, Chief of Police; Darnell D. Davenport, Captain, Community Officer, Outreach and Development Division; Officer Christopher Gibson, Community Outreach and Development Division, dated October 9, 2018. Provided in Appendix M-2 of this Draft EIR.

30056 provide rules to implement Proposition 172. Public safety services include police protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on police protection services, as well as other public safety services. In *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal.App.4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including police protection services, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.[2]

(b) California Vehicle Code

Section 21806 of the California Vehicle Code (CVC) pertains to emergency vehicles responding to Code 3 incident/calls.[3] This section of the CVC states the following:

> *Upon the immediate approach of an authorized emergency vehicle which is sounding a siren and which has at least one lighted lamp exhibiting red light that is visible, under normal atmospheric conditions, from a distance of 1,000 feet to the front of the vehicle, the surrounding traffic shall, except as otherwise directed by a traffic officer, do the following: (a)(1) Except as required under paragraph (2), the driver of every other vehicle shall yield the right-of-way and shall immediately drive to the right-hand edge or curb of the highway, clear any intersection, and thereupon shall stop and remain stopped until the authorized emergency vehicle has passed. (2) A person driving a vehicle in an exclusive or preferential use lane shall exit that lane immediately upon determining that the exit can be accomplished with reasonable safety... (c) All pedestrians upon the highway shall proceed to the nearest curb or place of safety and remain there until the authorized emergency vehicle has passed.*

2 *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal.App.4th 833.

3 A Code 3 response to any emergency may be initiated when one or more of the following elements are present: a serious public hazard, an immediate pursuit, preservation of life, a serious crime in progress, and prevention of a serious crime. A Code 3 response involves the use of sirens and flashing red lights.

(3) Regional

(a) County of Los Angeles Office of Emergency Management (OEM)

The Office of Emergency Management (OEM), established by Chapter 2.68 of the Los Angeles County Code, is responsible for organizing and directing emergency preparedness efforts, as well as the day-to-day coordination efforts, for the County's Emergency Management Organization. The OEM's broad responsibilities include, among others, planning and coordination of emergency services on a Countywide basis.[4]

Los Angeles County organizes a formal mutual aid agreement between all police departments within its jurisdiction to provide police personnel and resources to assist other member agencies during emergency and/or conditions of extreme peril. This ensures adequate resources should an emergency arise that requires immediate response by more law enforcement personnel than would be available to LAPD using only its own available resources.

(4) Local

(a) City of Los Angeles General Plan Framework

The City of Los Angeles General Plan Framework Element (General Plan Framework), originally adopted in December 1996 and re-adopted in August 2001, provides a comprehensive vision or strategy for long-term growth within the City and guides subsequent amendments of the City's Community Plans, Specific Plans, zoning ordinances, and other local planning programs.[5]

Chapter 9 of the General Plan Framework addresses infrastructure and public services that are applicable to the Project. The following objectives and goals relate to police services and law enforcement:[6]

> **Goal 9I**: Every neighborhood in the City has the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood.
>
> **Objective 9.13**: Monitor and forecast demand for existing and projected police services and facilities.

4 County of Los Angeles Chief Executive Office, Office of Emergency Management, About Emergency Management, https://ceo.lacounty.gov/emergency-management/#1509664666354-388bbaed-fcaf, accessed September 25, 2019.

5 City of Los Angeles Department of City Planning, City of Los Angeles General Plan, Citywide General Plan Framework Element, 1995.

6 City of Los Angeles Department of City Planning, City of Los Angeles General Plan, Citywide General Plan Framework Element, Chapter 9, Infrastructure and Public Services, 1995.

Policy 9.13.1: Monitor and report police statistics, as appropriate, and population projections for the purpose of evaluating police service based on existing and future needs.

Objective 9.14: Protect the public and provide adequate police services, facilities, equipment and personnel to meet existing and future needs.

Policy 9.14.7: Participate fully in the planning of activities that assist in defensible space design and utilize the most current law enforcement technology affecting physical development.

Objective 9.15: Provide for adequate public safety in emergency situations.

(b) Hollywood Community Plan

The Land Use Element of the City's General Plan is comprised of 35 Community Plans. The City's Community Plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use at the community level. The Community Plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The City's Community Plans implement the City's General Plan Framework Element at the local level. The City's Community Plans express the goals, objectives, policies, and programs to address growth within each of the individual communities and depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities. The Project is located within the Hollywood Community Plan area.

The Hollywood Community Plan was adopted in 1988 and addresses growth and the arrangement of land uses within its boundaries through the year 2010.[7] The 1988 Hollywood Community Plan includes a policy section regarding the provision of services; specifically policies for public facilities such as recreation and parks, fire protection, public schools, and libraries. However, no objectives, goals, or policies are provided specifically for police protection. With regard to the public facilities that are listed, the 1988 Hollywood Community Plan states, generally, that the development of such facilities "should be sequenced and timed to provide a balance between land use and public services at all times."[8]

(c) City of Los Angeles Charter and Administrative and Municipal Codes

The law enforcement regulations and the powers and duties of the LAPD are outlined in the City of Los Angeles Charter, Article V, Section 570; the City of Los

7 City of Los Angeles Department of City Planning, Hollywood Community Plan, adopted December 13, 1988, p. HO-2.

8 City of Los Angeles Department of City Planning, Hollywood Community Plan, adopted December 13, 1988, p. HO-6.

Angeles Administrative Code, Chapter 11, Section 22.240; and the Los Angeles Municipal Code (LAMC), Chapter 5, Article 2.

Article V, Section 570 of the City Charter gives the power and duty to LAPD to enforce the penal provisions of the City Charter and City ordinances, as well as state and federal law. The City Charter also gives responsibility to the officers of the LAPD to act as peace officers, as defined by state law, and the power and duty to protect lives and property in case of a disaster or public calamity. Section 22.240, Adherence to State Standards for Recruitment and Training of Public Safety Dispatchers, of the Administrative Code requires the LAPD to adhere to the state standards described in Section 13522 of the California Penal Code, which charges the LAPD with the responsibility of enforcing all LAMC Chapter V regulations related to fire arms, illegal hazardous waste disposal, and nuisances (such as excessive noise), and providing support to the Department of Building and Safety Code Enforcement inspectors and the Fire Department in the enforcement of the City's Fire, Building, and Health Codes. The LAPD is given the power and the duty to protect residents and property, and to review and enforce specific security related mitigation measures for new development.

b) Existing Conditions

(1) LAPD Service Areas and Bureaus

The LAPD provides police protection services in the City of Los Angeles, covering approximately 472.93 square miles and includes 21 community police service areas operated among four geographically defined bureaus: the Central, South, West, and Valley Bureaus. Each bureau is further defined by divisions and into reporting districts. The LAPD also has a variety of specialized units including Special Weapons and Tactics (SWAT), Off-Road Enforcement, Mounted Unit, Special Operations Support Division, Air Support Division, Art Theft Detail, K-9 Unit, Animal Cruelty Task Force, Gangs and Narcotics Division, and Specialized Enforcement Section (Motors and Commercial Enforcement).[9]

As of March 2, 2020, the departmental staffing resources within the LAPD include 10,004 sworn officers.[10] Based on a total City population of 4,029,741,[11] the LAPD currently has an officer-to-resident ratio of 2.5 officers for every 1,000 residents.

The Project Site is located within the jurisdiction of the West Bureau, Hollywood Division, of the LAPD. The West Bureau covers approximately 124 square miles

9 LAPD, Inside the LAPD, http://www.lapdonline.org/inside_the_lapd, accessed September 25, 2019.
10 LAPD, COMPSTAT Citywide Profile 02/02/20 to 02/29/20.
11 LAPD, COMPSTAT Citywide Profile02/02/20 to 02/29/20.

with a population of approximately 840,400 residents, and oversees operations in the communities of Hollywood, Wilshire, Pacific, and West Los Angeles, as well as the West Traffic Division, which includes the neighborhoods of Pacific Palisades, Westwood, Century City, Venice, Hancock Park, and the Miracle Mile.[12] The West Traffic Division is responsible for investigating traffic collisions and traffic-related crimes for all operations in the West Bureau. The West Bureau oversees operations at five community police stations: the Hollywood Community Police Station, the Wilshire Community Police Station, the Pacific Community Police Station, the Olympic Community Police Station and the West Los Angeles Community Police Station.[13] The Hollywood Community Police Station, which is the nearest to the Project Site, serves the Project Site and is described in more detail below.

(2) LAPD Hollywood Community Police Station

The Project Site is served by the Hollywood Community Police Station,[14] located at 1358 North Wilcox Avenue, approximately 0.70 miles southwest of both the West Site and East Site, as shown in **Figure IV.K.2-1**, *Location of Hollywood Community Police Station*. The Hollywood Community Police Station's boundaries encompass 17.2 square miles (Hollywood Community Area) and includes the communities of Argyle, Cahuenga Pass, East Hollywood, Fairfax, Hobart, Hollywood, Hollywood Hills, Hollywood/La Brea, Little Armenia, Los Feliz, Melrose District, Mount Olympus, Sierra Vista, Spaulding Square, Sunset Strip, Thai Town, and Vine/Willoughby.[15] The approximate borders of its service area are Mulholland Drive and the Griffith Park boundary to the north, the City of Los Angeles boundary and Melrose Avenue to the south, Normandie Avenue and the Griffith Park boundary to the east, and the City of Los Angeles boundary along a portion of Sycamore Avenue to the west.[16] Based on the information provided by the LAPD, as of November 2018, the Hollywood Community Police Station includes 352 sworn officers and 32 civilian support staff, who serve a population of approximately 300,000 persons.[17] Additionally, there are special service teams available within the LAPD to service the Hollywood Community Area.

12 LAPD, About West Bureau, http://www.lapdonline.org/west_bureau/content_basic_view/1869, accessed September 25, 2019.

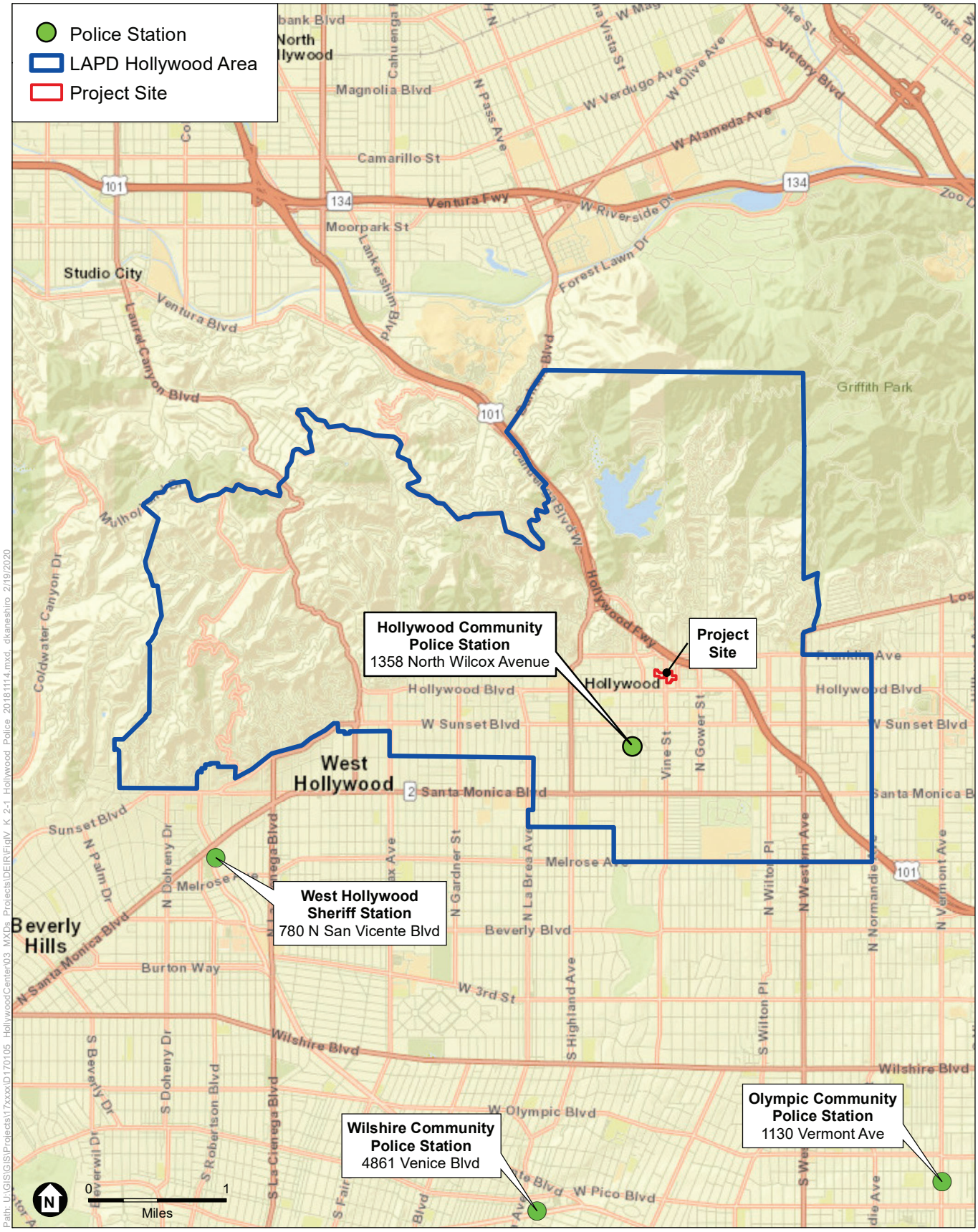
13 LAPD, West Bureau Community Police Stations, http://www.lapdonline.org/west_bureau/content_basic_view/1871, accessed March 6, 2020.

14 Michael R. Moore, Chief of Police; Darnell D. Davenport, Captain, Community Officer, Outreach and Development Division; Officer Christopher Gibson, Community Outreach and Development Division, dated October 9, 2018. Provided in Appendix M-2 of this Draft EIR.

15 LAPD, Hollywood Community Police Station, http://www.lapdonline.org/hollywood_community_police_station, accessed September 25, 2019.

16 Michael R. Moore, Chief of Police; Darnell D. Davenport, Captain, Community Officer, Outreach and Development Division; Officer Christopher Gibson, Community Outreach and Development Division, dated October 9, 2018. Provided in Appendix M-2 of this Draft EIR.

17 Michael R. Moore, Chief of Police; Darnell D. Davenport, Captain, Community Officer, Outreach and Development Division; Officer Christopher Gibson, Community Outreach and Development Division, dated October 9, 2018. Provided in Appendix M-2 of this Draft EIR.



SOURCE: ESRI 2018; LAPD, Central Bureau 2017
NOTE: The Project Site is served by the Hollywood Community Police Station

Hollywood Center Project

Figure IV.K.2-1
Location of Hollywood Community Police Station

In the event a situation arises requiring increased staffing, additional officers can be called in from other LAPD area police stations (the other closest stations within the West Bureau being the Wilshire Community Police Station, the Pacific Community Police Station, the Olympic Community Police Station and the West Los Angeles Community Police Station). As with all municipal police departments in Los Angeles County, the LAPD also participates in the Mutual Aid Operations Plan for Los Angeles County (see further discussion under Regulatory Framework above). The Mutual Aid Operations Plan is a reciprocal agreement between signatory agencies (in this case, the Los Angeles County Sheriff's Department, which provides police services under contract to the City of West Hollywood, or other local police departments) to provide police personnel and resources to assist other member agencies during emergencies and/or conditions of extreme peril.

The emergency response system of the Hollywood Community Police Station is directly linked to the LAPD Communications Division's Dispatch Centers. The Communications Division has the responsibility to staff and answer, on a 24-hour basis, the telephones upon which 911 emergency calls for service are received (includes police, fire, and paramedic). According to the LAPD, the average response time to emergency calls for service in the Hollywood Community Area during 2017 was 3.2 minutes. The average response time for non-emergency calls for service in the Hollywood Community Area during 2017 was 24.2 minutes.[18]

(3) LAPD Crime Statistics

Currently, the LAPD operates under a Computer Statistics (COMPSTAT) Plus program that implements the General Plan Framework Element (Framework Element) goal of assembling statistical population and crime data to determine necessary crime prevention actions. COMPSTAT Plus is based on the COMPSTAT program that was created in 1994 by then Police Commissioner of the New York Police Department and former LAPD Chief William J. Bratton.

The COMPSTAT Unit implements the Framework Element goal of assembling statistical population and crime data to determine necessary crime prevention actions. This system implements a multi-layered approach to police protection services through statistical and geographical information system analysis of growing trends in crime through a specialized crime control model. COMPSTAT has been shown to reduce crime occurrences in Los Angeles communities through accurate and timely intelligence regarding emerging crime trends or patterns.[19] With its specialized crime control model, the COMPSTAT system implements a

[18] Michael R. Moore, Chief of Police; Darnell D. Davenport, Captain, Community Officer, Outreach and Development Division; Officer Christopher Gibson, Community Outreach and Development Division, dated October 9, 2018. Provided in Appendix M-2 of this Draft EIR.

[19] LAPD, COMPSTAT Plus, http://www.lapdonline.org/inside_the_lapd/content_basic_view/6364, accessed September 25, 2019.

multi-layer approach to police protection services through statistical and geographical information system analysis of trends in crime.

Table IV.K.2-1, *Population, Officer, and Crime Comparison (2017),* lists the resident population, number of sworn officers, officer/resident ratio, number of crimes, and crimes per 1,000 residents for the Hollywood Community Area and Citywide for year 2017, the latest data available. As reported therein, the officer to resident population ratios within the Hollywood Community Area and Citywide are 1:852 and 1:400, respectively, and the number of crimes per 1,000 residents within the Hollywood Community Area and Citywide is 15 and 32, respectively.

TABLE IV.K.2-1
POPULATION, OFFICER, AND CRIME COMPARISON (2017)

Service Area	Square Miles	Resident Population	Sworn Officers	Officers/ Resident Ratio	Annual Reported Crimes	Crimes per 1,000 Residents
Hollywood Community Area	17.2[a]	300,000[a]	352[a]	1/852[a]	4,630[a,b]	15[c]
Citywide	472.9[d]	4,007,905[d]	10,029[d]	1/400[e]	129,587[d]	32[f]

[a] Michael R. Moore, Chief of Police; Darnell D. Davenport, Captain, Community Officer, Outreach and Development Division; Officer Christopher Gibson, Community Outreach and Development Division, dated October 9, 2018. Provided in Appendix M-2 of this Draft EIR.

[b] Crime data is provided for 2017 (the latest whole year for which annual crime data was available) in the LAPD Letter, provided as Appendix M-2 of this Draft EIR.

[c] 4,630 crimes/300,000 residents = 0.015 X 1,000 = 15 crimes per 1,000 residents

[d] LAPD, COMPSTAT Citywide Profile 12/04/17-12/31/17. This number differs compared to the previously listed 10,004 sworn officers as of March 2, 2020, as based on the latest COMPSTAT data.

[e] 4,007,905 residents/10,029 officers = 400 residents/1 officer.

[f] 129,587 crimes/4,007,905 residents = 0.032 X 1,000 = 32 crimes per 1,000 residents.

SOURCE: ESA, 2019.

As reported by the LAPD, as a whole, Citywide crime decreased steadily between 2003 and 2014.[20] This decrease was attributed to a number of factors, including the LAPD's decade long use of COMPSTAT, which enables the LAPD to track crime trends and appropriately deploy officers, and the LAPD's emphasis on crime prevention and intervention in addition to enforcement.[21]

In 2015, overall crime increased in all categories, with violent crime increasing Citywide by 20 percent and property crime increasing by 10 percent.[22] According

[20] 89.3 KPCC Southern California Public Radio, Crime & Justice, LAPD: Crime in Los Angeles Down for the 11th Straight Year, January 13, 2014.

[21] 89.3 KPCC Southern California Public Radio, Crime & Justice, LAPD: Crime in Los Angeles Down for the 11th Straight Year, January 13, 2014.

[22] LAPD, LAPD Statement on Crime Fighting Strategies, News Release dated January 20, 2016.

to the LAPD, many factors contribute to the increases, including increased homelessness and drug use; the recent approval of California Proposition 47 and AB 109, which reduced penalties for certain offenses such as drug possession and minor thefts to misdemeanors; stricter reporting of aggravated assaults under the federal Uniform Crime Report system; and increased outreach to victims of domestic violence, which is traditionally an underreported crime.[23] However, in 2018, overall crime throughout the City was down in all categories except for personal theft.[24] For example, violent crime was down about four percent compared to 2017, and property crime decreased by two percent.

To help minimize crime throughout the City, numerous efforts have been implemented over recent years. According to the LAPD, these include, but are not necessarily limited to, training and deploying specially-trained officers assigned to LAPD's Metropolitan Division, who are flexibly deployed to rapidly respond to crime spikes and proactively prevent crimes throughout the City; increasing the number of Domestic Abuse Response Teams; expanding the Gang Reduction and Youth Development (GRYD) program to include twice as many GRYD zones that provide prevention and intervention services to at-risk youth; combining City and County efforts to reduce homelessness by increasing available housing and providing additional support services; and doubling the number of specially-trained teams of police officers and mental health professionals to respond to incidents involving a mental health crisis.[25]

Table IV.K.2-2, *LAPD Hollywood Community Area Crime Statistics (2017),* summarizes the crime statistics for the Hollywood Community Area from 2017 (the latest whole year for which annual crime data is available). As indicated therein, crimes in the Hollywood Community Area totaled 4,630, with most of the crimes related to burglary from motor vehicle.

(4) Existing Project Site Features

The West Site is currently developed with a single-story commercial building used for storage by American Musical and Dramatic Academy (AMDA) and paid public surface parking lot. The surface parking lot on the West Site is enclosed by iron fencing and secured by a lockable gate and contains a parking attendant kiosk. The East Site includes the Capitol Records Building and Gogerty Building (the Capitol Records Complex) with a dedicated surface parking lot, in addition to a separate paid public parking lot. The Capitol Records parking lot on the East Site is controlled by gated access. No existing housing or other commercial uses are

23 LAPD, LAPD Statement on Crime Fighting Strategies, News Release dated January 20, 2016.
24 Los Angeles Times, Crime is down in Los Angeles for the first time in five years, December 29, 2018, https://www.latimes.com/local/lanow/la-me-lapd-crime-stats-20181229-story.html, accessed February 14, 2019.
25 LAPD, LAPD Statement on Crime Fighting Strategies, News Release dated January 20, 2016.

located on the Project Site. The surface parking lots are lit by street lights and lamps located at the boundaries and center of the parking lots.

TABLE IV.K.2-2
HOLLYWOOD COMMUNITY AREA CRIME STATISTICS (2017)

	Hollywood Community Area	
Crime	**Number**	**Percent of Hollywood Community Area Crime[a]**
Homicide	2	0%
Rape	76	2%
Robbery	386	8%
Aggravated Assault	511	11%
Burglary	353	8%
Motor Vehicle Theft	442	9%
Burglary From Motor Vehicle	1,519	33%
Personal/Other Theft	1,341	29%
Total	**4,630**	**100%**

[a] Percentages are rounded.

SOURCE: Michael R. Moore, Chief of Police; Darnell D. Davenport, Captain, Community Officer, Outreach and Development Division; Officer Christopher Gibson, Community Outreach and Development Division, dated October 9, 2018. Provided in Appendix M-2 of this Draft EIR.

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a project would have a significant impact related to police protection services if it would:

Threshold (a): 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.

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions. The factors to evaluate police services impacts include:

- The population increase resulting from the proposed project, based on the net increase of residential units or square footage of non-residential floor area;

- The demand for police services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the project's proportional contribution to the demand; and
- Whether the project includes security and/or design features that would reduce the demand for police services.

b) Methodology

The analysis of impacts on police protection addresses the Project's effects on the ability of police personnel to adequately serve existing and future population in the Project vicinity, taking into consideration the Project's security and/or design features intended to reduce the demand for police protection services and potential need for new or expanded police facilities. The analysis presents statistical data for the Hollywood Community Area and Citywide, including the ratio of crimes to residents and the ratio of sworn police officers to residents. The ratio of police officers to residential population is used by LAPD as an indicator of the level of service offered and serves as a basis for measuring the increase in policing required for the Project.

The Project's police service population, which was calculated using Police Service Population Conversion factors in the 2006 L.A. CEQA Thresholds Guide, was used to determine the population increase resulting from the Project. The 2006 L.A. CEQA Thresholds Guide's Police Service Population Conversion factors account for the number of residents and both commercial and residential visitors who would be present at any one time due to, or generated by, the Project. While the police service population calculates service population for non-residential uses, the LAPD does not provide crime rates or police officer service ratios for non-residential uses and does not use such ratios to measure service levels.

The AMDA-leased building on the Project Site, which is proposed for demolition under the Project, is currently used for storage, and is accessed on a daily basis for sets and props. Although current use of the building may generate demand for police services, it is expected to be negligible as there is no sizeable or regular building occupancy. Accordingly, to present a conservative analysis, calculations of demand for police services associated with the Project do not take credit for existing demand associated with this commercial use. Similarly, no credit is taken for existing demand associated the surface parking lots on the Project Site. The Capitol Records Complex, which would remain on the Project Site under the Project, also generates current demand for polices services. However, use of the Capitol Records Complex and associated demand is not expected to meaningfully change. Therefore, analysis of demand for police services is focused solely on demand associated with the new uses proposed for the Project Site.

In consideration of the above factors, a determination is made as to whether the LAPD would require the addition of a new or physically altered facility to maintain acceptable service levels, the construction of which could result in a potentially significant environmental impact. As part of the analysis, the LAPD was consulted and its responses were incorporated regarding the Project.

c) Project Design Features

(1) Construction

Refer to Project Design Features TRAF-PDF-2 (Construction Traffic Management Plan) and TRAF-PDF-3 (Construction Worker Parking Plan) in Section IV.L, *Transportation,* of this Draft EIR. In addition, the following Project Design Feature related to police protection services during Project construction will be implemented as part of the Project:

- **POL-PDF-1: Security Features During Construction.** Private security personnel will monitor vehicle and pedestrian access to the construction areas and patrol the Project Site, construction fencing with gated and locked entry will be installed around the perimeter of the construction site, and security lighting will be provided in and around the construction site.

(2) Operation

The following Project Design Feature related to police protection services during Project operation will be implemented as part of the Project. On account of the Master Conditional Use Permit entitlement, insofar as each individual owner/establishment will have to return for a Plan Approval, wherein each respective establishment will be subject to further review by the Zoning Administrator, whom may add further security enhancements as Conditions of Approval, the following include, but are not be limited to, measures which characterize typical security efforts for similar commercial establishments in the vicinity:

- **POL-PDF-2: Security Features During Operation.** During operation, the Project will incorporate a 24-hour/seven-day security program to ensure the safety of its residents, employees, patrons, and site visitors. The Project's security will include, but not be limited to, the following design features:

  a) Installing and utilizing a 24-hour security camera network throughout the underground and above-ground parking garages, the elevators, the common and amenity spaces, the lobby areas, and the rooftop and ground level outdoor open spaces. All security camera footage will be maintained for at least 30 days, and such footage will be provided to the LAPD, as needed.

b) Full-time security personnel. Duties of the security personnel will include, but would not be limited to, assisting residents and visitors with Project Site access, monitoring entrances and exits of buildings, and managing and monitoring fire/life/safety systems.

c) Staff training and building access/design to assist in crime prevention efforts and to reduce the demand for police protection services.

d) Controlled access to all housing units, hotel areas, and residential common open space areas through the use of key cards, site security and/or other means, as appropriate.

e) Maintenance of unrestricted access to commercial/restaurant uses, publicly accessible open space areas, and the paseo during business hours, with public access (except for authorized persons) prohibited after the businesses have closed via the use of gates, signage security patrols and/or other means determined appropriate.

f) Lighting of entryways, publicly accessible areas, and common building and open space areas associated with the housing units and hotel rooms for security purposes.

g) Regarding public events in the open space areas, following event completion and attendee dispersal, barricades to be placed on the stages, and regularly scheduled security patrols, as well as camera surveillance, to reduce the potential for undesirable activities within the publicly accessible open space.

d) Analysis of Project Impacts

Construction activities would be essentially the same under the Project and the Project with the East Site Hotel Option. Accordingly, Project-related construction impacts under Threshold (a) would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the construction impact analysis presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

During operation, the Project and the Project with the East Site Hotel Option would include the same access, circulation, and supporting police protection features, as described below. However, the police service population calculations would slightly differ under the Project from the Project with the East Site Hotel Option. Therefore, separate service population and related crime rate calculations and analyses are provided for the impact analysis under this threshold. However, Project-related operational impacts under Threshold (a) would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the impact analysis and impact significance presented

below are the same and apply to the Project and the Project with the East Site Hotel Option.

Threshold (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 police protection?

(1) Impact Analysis

(a) Construction Impacts

During construction, equipment, building materials, vehicles, and temporary offices, would be temporarily located on the Project Site, which could be subject to theft or vandalism. Therefore, when not properly secured, construction sites can become a distraction for local law enforcement from more pressing matters that require their attention. This could result in an increase in demand for police protection services. Consequently, developers typically take precautions to prevent trespassing through construction sites, such as installation of temporary fencing around the construction site to keep potential trespassers out and deployment of roving security guards to prevent problems during a project's construction. When such precautions are taken, there is less of a need for local law enforcement at the construction site.

The Project Site is easily accessed from the adjacent roadways. The Project Site would need to be secured during construction in order to avoid potential theft. Fencing and other security features, such as perimeter fencing, lighting, and security guards (as necessary), would be provided at the Project Site during construction, thereby reducing the potential need for LAPD services (refer to Project Design Feature POL-PDF-1). Security measures will ensure that valuable materials (e.g., building supplies and metals, such as copper wiring), as well as construction equipment, are not easily stolen or abused. This is especially important since the Project Site is located at the intersection of multiple streets that have an active walking and/or driving environment. The specific type and combination of construction site security features would depend on the phase of construction. Implementation of these security features would minimize the Project's potential need for police protection services during the construction phase.

Emergency response vehicles can use a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Although minor traffic delays due to temporary lane closures needed to

facilitate specific construction activities could occur, particularly during the construction of utilities and street improvements, impacts to police protection services would be considered less than significant for the following reasons:

1. Emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the LAPD;
2. Construction impacts are temporary in nature and do not cause lasting effects; and
3. Partial lane closures, if determined to be necessary, would not significantly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic, in accordance with Section 21806 of the CVC. Additionally, if there are partial closures to streets surrounding the Project Site, flagmen would be used to facilitate the traffic flow until such temporary street closures are complete.

A Construction Traffic Management Plan subject to review and approval by the City of Los Angeles Department of Transportation (LADOT) will be incorporated into the Project as provided in Project Design Feature TRAF-PDF-2. The Construction Traffic Management Plan will include street closure information, detour plans, haul routes, and staging plans and would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. Also, a separate Construction Worker Parking Plan will be prepared pursuant to Project Design Feature TRAF-PDF-3. This Plan will specify specific locations where construction workers are allowed to park, so as to not interfere with emergency vehicle access.

As there would be private security personnel, no additional officers from LAPD would be needed to monitor the Project Site during construction outside of existing officers that patrol the area. Any potential LAPD officers needed to patrol the Project Site would be from the existing officers at the Hollywood Community Police Station. Additionally, the various safety and control features that would be implemented during Project construction would reduce the potential for incidents that would require police responses. **Therefore, impacts resulting from the Project or the Project with the East Site Hotel Option construction would not create the need for new or physically altered police facilities, the construction of which would result in substantial adverse environmental impacts, in order to maintain acceptable service. As such, impacts would be less than significant.**

(b) Operational Impacts

(i) Project Police Service Population and Crime Rate

As shown below in **Table IV.K.2-3**, *Project Increases in Police Service Population,* the Project would introduce new resident and visitor populations and would increase the existing number of employees at the Project Site, which would increase the demand for police protection from the LAPD.

TABLE IV.K.2-3
PROJECT INCREASES IN POLICE SERVICE POPULATION

Land Use	Amount of Development	Generation Factor (population per unit)[a]	Police Service Population
Residential Uses			
One-, Two-Bedroom Units	873 units	3 persons/unit	2,619
Three-Bedroom Units	132 units	4 persons/unit	528
Subtotal Residential Population Generated			*3,147*
Non-Residential Uses			
Commercial	30,176 sf	3 persons/1,000 sf	91
Subtotal Non-Residential Population Generated			*91*
Total Police Service Population			**3,238**

[a] The generation factors for non-residential uses are based on the Police Service Population Conversion Factors from the 2006 L.A. CEQA Thresholds Guide. As stated in Subsection IV.K.2.3.b, Methodology, above, the Project-generated police service population was calculated based on the 2006 L.A. CEQA Thresholds Guide, which includes the number of residents and visitors per unit or 1,000 square feet that would be present at any one time during Project operation.

SOURCE: ESA, 2019.

As shown in Table IV.K.2-3, the Project would generate approximately 3,147 new residents. LAPD does not provide crime rates for non-resident population; rather, crime associated with non-resident population is reflected within the overall community service ratio based on the residential population as an overall police service population. Nonetheless, to be conservative, if the non-residential population were combined with the residential population (police service population), the Project would generate an estimated total of 3,238 people (3,147 residents plus 91 non-residents), consisting of residents, employees, visitors who would require police protection services.

Based on the generation factor of 15 crimes per 1,000 residents (or service population as evaluated herein), and without accounting for Project characteristics

and/or design features and personnel that are designed to reduce crime, the Project could potentially result in approximately 49 additional crimes per year.[26] This represents the potential for an approximately 1.1-percent increase in crime reports in the Hollywood Community area without accounting for the security personnel and features that are proposed as part of the Project.[27] The increase in population of 3,238 persons in the Hollywood Community area would reduce the officer to resident ratio from 1:852 to 1:861.[28]

If it were determined that additional officers would be needed to maintain existing service ratios, the Project contribution would be approximately four additional officers.[29] Four additional officers would increase the existing officer total of 352 to 356 total officers, or an increase of approximately 1.1 percent of the officers at the Hollywood Community Police Station.[30]

(ii) Project with the East Site Hotel Option Police Service Population and Crime Rate

As shown in **Table IV.K.2-4**, *Project with the East Site Hotel Option Increases in Police Service Population,* the Project with the East Site Hotel Option would similarly increase demand for police protection from the LAPD. The Project would have a smaller residential population generation than the Project with the East Site Hotel Option, but the Project with the East Site Hotel Option would generate a larger non-residential population than the Project.

Similar to the Project, to be conservative, using the overall population increase (residential plus non-residential), the Project with the East Site Hotel Option would generate an estimated total of 3,199 people (2,778 residents plus 421 non-residents), consisting of residents, employees, visitors who would require police protection services. Based on the generation factor of 15 crimes per 1,000 service population, and without accounting for Project characteristics and/or design features and personnel, the Project with the East Site Hotel Option could potentially result in approximately 48 additional crimes per year.[31] This represents the potential for an approximately 1.0-percent increase in crime reports in the Hollywood Community without accounting for the security personnel and features that are proposed as part of the Project.[32] The increase in population of 3,199 persons in the Hollywood Community Area would reduce the officer to resident ratio from 1:852 to 1:861, which is the same as the Project. Also, similar to the

26 3,238 new population X 15 crimes/1,000 population = 48.57, rounded up to 49 additional crimes per year.
27 49 additional crimes per year/4,630 annual crimes = 1.1 percent.
28 300,000 existing residents + 3,238 new population = 303,238 residents/352 existing officers = one officer per 861 residents.
29 3,238 new population X (one officer per 852 residents) = 3.8, rounded up to 4 additional officers.
30 4 additional officers/352 existing officers = 1.1 percent.
31 3,199 new population X 15 crimes/1,000 population = 47.985, rounded up to 48 additional crimes per year.
32 48 additional crimes per year/4,630 annual crimes = 1.0 percent.

Project, four additional officers would be needed to maintain existing services ratios.

TABLE IV.K.2-4
PROJECT WITH THE EAST SITE HOTEL OPTION INCREASES IN POLICE SERVICE POPULATION

Land Use	Amount of Development	Generation Factor (population per unit)[a]	Police Service Population
Residential Uses			
One-, Two-BR Units	758 units	3 persons/unit	2,274
Three-BR Units	126 units	4 persons/unit	504
Subtotal Residential Population Generated			*2,778*
Non-Residential Uses			
Commercial	30,176 sf	3 persons/1,000 sf	91
Hotel	220 rooms	1.5 persons/room/day	330
Subtotal Non-Residential Population Generated			*421*
Total			**3,199**

[a] The generation factors for non-residential uses are based on the Police Service Population Conversion Factors from the 2006 L.A. CEQA Thresholds Guide. As stated in Subsection IV.K.2.3.b, Methodology, above, the Project-generated police service population was calculated based on the 2006 L.A. CEQA Thresholds Guide, which includes the number of residents and visitors per unit or 1,000 square feet that would be present at any one time during Project operation.

SOURCE: ESA, 2019.

(iii) Project Police Service Impact Assessment

As indicated in the analysis above, the Project and the Project with the East Site Hotel Option could result in an approximately 1.0- to a 1.1-percent increase in crimes in the Hollywood Community and reduce the officer to resident ratio from 1:852 to 1:861. Four additional officers would be needed to maintain the existing officer to resident service ratio in the Project Area. However, it is recognized that LAPD determines the need for new officers based on a variety of factors, which could be influenced by. shifts in station and/or patrol boundaries, ongoing staff changes, service populations, crime statistics and technological enhancements may be considered when new officers are hired.

Project Design Feature POL-PDF-2 would help to offset the Project's operational demand for police protection services from LAPD. As provided in Project Design Feature POL-PDF-2, the Project will incorporate a 24-hour/seven-day security program to ensure the safety of its residents, employees, and site visitors. The Project will install and utilize a 24-hour security camera network throughout the parking garages, the elevators, the common and amenity spaces, the lobby areas,

and the rooftop and ground level outdoor open spaces. The Project's security personnel and features would provide natural surveillance through visual connections between residential/commercial units and public environments, locating common areas as centrally as possible or near major circulation paths, avoiding ambiguous walkways and entries, and providing adequate lighting and pathways. This is in contrast to existing conditions in the area, which include surface parking lots and long alleys between blocks, where buildings are partially cut off from the street, thus providing an environment for undesirable activity. These security features would help reduce the potential for on-site crimes, including loitering, theft, and burglaries, and would reduce demand for LAPD services. Additionally, the Project Applicant would contribute to the local Business Improvement District (BID), which has a seven day a week security patrol, which would assist in safety services and potentially increase patrols, thereby reducing the Project's need for additional LAPD services.

As described in Chapter II, *Project Description*, of this Draft EIR, vehicular access to the Project Site, including access for emergency vehicles, would access the Project Site from surrounding roadways, including Ivar Avenue, Yucca Street, and Argyle Avenue. Operation of the Project would not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency vehicle access to the Project Site and in the Project vicinity. As such, emergency access to the Project Site would be maintained at all times. It is acknowledged that the Project would increase traffic on surrounding roadways. However, the area surrounding the Project Site includes an established street system, consisting of freeways, primary and secondary arterials, and collector and local streets, which provide regional, sub-regional, and local access and circulation within the local Project vicinity. Emergency response is routinely facilitated, particularly for high priority calls, through the use of sirens to clear a path of travel (including bypassing of signalized intersections), driving in the lanes of opposing traffic pursuant to CVC Section 21806 and multiple station response. In addition, because of the grid pattern of the local street system and the proximity to multiple freeways, police vehicles have multiple routes available to respond to emergency calls at the Project Site. Therefore, based on the considerations above, despite the Project increase in traffic, the Project would not significantly impair the LAPD from responding to emergencies at the Project Site or the surrounding area.

Based on the above analysis, the Project or the Project with the East Site Hotel Option would not generate a demand for additional police protection services that could exceed the LAPD's capacity to serve the Project Site. Furthermore, the Project or the Project with the East Site Hotel Option would not result in substantial adverse physical impacts associated with the provision of a new or physically altered police facility, 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, and impacts would be less than significant.

(2) Mitigation Measures

Impacts regarding police protection services were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding police protection services were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

The Project and the Project with the East Site Hotel Option would include the same access, circulation, supporting police protection features and result in less than significant Project-level police protection services impacts. Accordingly, cumulative impacts would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the cumulative impact analysis and impact significance for the Project presented below are the same and also apply to the Project with the East Site Hotel Option.

(1) Impact Analysis

Chapter III, *Environmental Setting*, of this Draft EIR, identifies 150 related projects that are anticipated to be developed in the Project vicinity. For purposes of this analysis of cumulative impacts on police protection services, only those projects located within LAPD's Hollywood Community Area are considered as related projects. Projects located in other service areas would be served by their respective police stations. Of the 150 related projects, 115 are located within the Hollywood Community Area. The related projects include residential, office, commercial/retail/restaurant, and hotel uses. **Table IV.K.2-5**, *Cumulative Population for Police Services,* shows the estimated cumulative residential and non-residential populations for the related projects in the Hollywood Community Area.

(a) Construction Impacts

In general, impacts to LAPD services and facilities during the construction of each related project would be addressed as part of each project's respective environmental review process conducted by the City. Similar to the Project, each related project would be required to implement a construction traffic management plan to ensure that adequate emergency access to the property and neighboring properties is maintained. Related projects would also be required to implement similar security measures as under the Project to limit access to construction areas, such as hiring private security, installing construction fencing, and including security lighting. The specific type and combination of construction site security features would depend on the phase and duration of construction. The related projects would need to coordinate emergency accessibility with LAPD and/or

LADOT, as necessary, to their respective sites to ensure that emergency access would be maintained through temporary lane closures or marked emergency access points. Construction-related traffic generated by the Project and related projects would not adversely affect LAPD service in the Project vicinity as drivers of police and emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic.

TABLE IV.K.2-5
CUMULATIVE POPULATION FOR POLICE SERVICES

Land Use	Amount of Development	Generation Factor (population per unit)[a]	Residential Population	Non-Residential Population
Related Projects				
Residential	13,623 du	3 persons/unit	40,869	
Retail	3,039.42 ksf	3 persons/ksf		9,118
Office	5,148.50 ksf	4 persons/ksf		20,594
Hotel	3,553 rooms	1.5 persons/room		5,330
Total Related Projects			**40,869**	**35,042**
Project Generation			*3,147*	*91*
Project with the East Site Hotel Option Generation			*2,778*	*421*
Related Projects + Project			**44,016**	**35,133**
Related Projects + Project with the East Site Hotel Option			**43,647**	**35,463**

du = dwelling units; ksf = 1,000 square feet

[a] The generation factors are based on the Police Service Population Conversion Factors from the 2006 L.A. CEQA Thresholds Guide. As stated in Subsection IV.K.2.3.b, Methodology, above, the police service population was calculated based on the 2006 L.A. CEQA Thresholds Guide, which includes the number of residents and visitors per unit or 1,000 square feet that would be present at any one time during Project operation.

SOURCE: ESA, 2019.

Based on the above, the Project's or the Project with the East Site Hotel Option's contribution to cumulative construction impacts would not be cumulatively considerable. As such, cumulative impacts on police protection services would be less than significant.

(b) Operational Impacts

As indicated in Table IV.K.2-5, the Project (3,147 residents plus 91 non-residents) would represent the highest or most conservative estimate of new population on the Project Site. Thus, the Project plus the related projects (40,869 residents plus 35,042 non-residents) would increase the service population of LAPD's Hollywood

Community Area by an estimated 44,016 residents and 35,133 non-residents. The new residential population generated by the Project plus related projects could generate an additional 661 crimes per year in the Hollywood Community Area, assuming the same crime per capita rate as existing conditions.[33] The new residential plus non-residential population of the Project plus related projects could generate an additional 1,187 crimes per year in the Hollywood Community Area.[34] (This would be the same number of crimes under the Project with the East Site Hotel Option.)[35]

The new residents generated by the Project and related projects would result in an officer-to-resident ratio of 1:977 and would require an additional 52 officers (an additional 14.7 percent) to maintain the existing ratio of 1:852.[36] If the non-residential population were assumed to be residents, the officer-to-resident ratio would decrease to 1:1,077 and would require an additional 93 officers (an additional 26.4 percent) to maintain the existing ratio of 1:852.[37] Therefore, the Project, together with related projects, would cumulatively generate increased demand for police protection services from the Hollywood Community Police Station compared to existing conditions. (The same number of additional officers would be required for the Project with the East Site Hotel Option.)[38,39]

However, these are conservative estimates because the related projects' generated populations would not all be net new residents and non-residents (i.e., these population projections do not take into account existing development and the associated existing resident and non-resident populations to be removed due to the development of the related projects). Additionally, the projections do not account for related projects that do not proceed beyond the application phase or ultimately are not built. The projections also do not consider the reduction in criminal activity that is likely to occur as a result of development of the related projects, which include residential, office, commercial/retail/restaurant, and hotel uses as the related projects would seek to activate their frontages and increase the amount of activity around their respective sites. The commercial related projects, such as those with office, retail, and restaurant components, would also

33 44,016 new residents X 15 crimes/1,000 residents = 660.24, rounded up to 661 additional crimes per year.

34 79,194 new population X 15 crimes/1,000 residents = 1,187.91, rounded up to 1,188 additional crimes per year.

35 79,110 new population X 15 crimes/1,000 residents = 1,186.65, rounded up to 1,187 additional crimes per year.

36 300,000 existing residents + 44,016 new residents = 344,016 residents/352 existing officers = one officer per 977 residents. 44,016 new residents X (one officer per 852 residents) = 51.66, rounded up to 52 additional officers.

37 300,000 existing residents + 79,149 new population = 379,149 residents/352 existing officers = one officer per 1,077 residents. 79,149 new population X (one officer per 852 residents) = 92.95, rounded up to 93 additional officers.

38 300,000 existing residents + 43,647 new residents = 343,647 residents/352 existing officers = one officer per 976 residents. 43,647 new residents X (one officer per 852 residents) = 51.23, rounded up to 52 additional officers.

39 300,000 existing residents + 79,110 new population = 379,110 residents/352 existing officers = one officer per 1,077 residents. 79,110 new population X (one officer per 852 residents) = 93 additional officers.

be expected to provide on-site security, personnel, and/or design features for their visitors and patrons.

With regard to response times, the Project and related projects would introduce new uses that would generate additional traffic in the Hollywood Community. Traffic from the Project and related projects has the potential to increase emergency vehicle response times due to travel time delays caused by the additional traffic. However, as with the Project, related projects are expected to include design features and may include mitigation measures that would serve to reduce traffic impacts. Furthermore, as previously stated, emergency response vehicles can use a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, despite the cumulative increase in traffic, the Project and related projects would not significantly impair the LAPD from responding to emergencies at the Project Site or the surrounding area.

Additionally, similar to the Project, the related projects would contribute revenue to the City's General fund, which could fund LAPD expenditures as necessary to offset the cumulative incremental impact on police services. Through this process, LAPD would be able to provide adequate facilities to accommodate future growth and maintain acceptable levels of service. Additional increased demands for LAPD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding), to which both the Project and related projects would contribute.

With regard to cumulative impacts on police protection, consistent with *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) in Subsection IV.K.2.3.b.(1) above, the obligation to provide adequate police protection services is the responsibility of the City. Through the City's regular budgeting efforts, LAPD's resource needs, and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. At this time, LAPD has not identified that it will be constructing a new station in the area impacted by this Project either because of this Project or this Project and other projects in the service area. If LAPD determines that new facilities are necessary at some point in the future, such facilities (1) would occur where allowed under the designated land use, (2) would be located on parcels that are infill opportunities on lots that are typically between 0.5 and 1 acre in size, and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 or Mitigated Negative Declaration and would not be expected to result in significant impacts. Further analysis, including a specific location, would be speculative and beyond the scope of this document.

Based on the above, the Project's or the Project with the East Site Hotel Option's contribution to cumulative operational impacts would not be cumulatively considerable. As such, cumulative impacts on police protection services would be less than significant.

(2) Mitigation Measures

Cumulative impacts regarding police protection services were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts with regard to police protection services were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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IV. Environmental Impact Analysis

K.3 Public Services – Schools

1. Introduction

This section evaluates the Project's potential impacts on school facilities and services operated by the Los Angeles Unified School District (LAUSD), which has jurisdiction of public schools that serve the Project Site. The analysis estimates the number of students that would be generated by the Project using the LAUSD student generation rates and focuses on whether existing LAUSD school facilities would have sufficient available capacity to accommodate these students. The analysis addresses all levels of educational facilities operated by the LAUSD (i.e., elementary, middle, and high schools). The analysis is based, in part, on written correspondence from LAUSD, which is provided in Appendix M-3 of this Draft EIR.[1]

2. Environmental Setting

a) Regulatory Framework

(1) California Education Code

Educational services for the Project are subject to the rules and regulations of the California Education Code and governance of the State Board of Education. The State has passed legislation for the funding of local and public schools and provided the majority of monies to fund education in the State. To assist in providing facilities to serve students generated from new development projects, the State passed Assembly Bill (AB) 2926 in 1986, allowing school districts to collect impact fees from developers of new residential, commercial, and industrial developments. The State also provides funding through a combination of sales and income taxes. In addition, pursuant to Proposition 98, the State is also responsible for the allocation of educational funds that are acquired from property taxes. Further, the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities.[2]

1 Rena Perez, Director, Los Angeles Unified School District (LAUSD), letter correspondence dated January 7, 2019. Provided in Appendix M-3 of this Draft EIR.

2 California Education Code Section 17620(a)(1).

(2) Senate Bill 50

The Leroy F. Greene School Facilities Act of 1998 (known as Senate Bill 50 [SB 50]), enacted in 1998, is a program for funding school facilities largely based on matching funds. It placed a $9.2 billion State bond measure (Proposition 1A), which included grants for modernization of existing schools and construction of new schools, on the ballot of the election of November 3, 1998. Proposition 1A was approved by voters, enabling SB 50 to become fully operative. The new construction grant provides funding on a 50/50 State and local match basis. The modernization grant provides funding on a 60/40 basis. Districts that are unable to provide some or all of the local match requirement and are able to meet the financial hardship provisions may be eligible for additional state funding.[3]

SB 50 permits the LAUSD to levy a building permit fee, charge, dedication requirement, or other requirement against any development project within its boundaries, for the purpose of funding the construction or reconstruction of school facilities. SB 50 also caps the fees a developer may be required to pay. Fees are established by the State Allocation Board every two years based on demonstrated need as set forth in the LAUSD's School Facilities Needs Analysis. School district building permit fees for new construction within the City of Los Angeles (City) at the time of this writing are as follows:[4]

- Office: $1.57/square foot
- Retail: $1.31/square foot
- Commercial: $0.61/square foot
- Hotel: $0.52/square foot
- Residential: $3.79/square foot
- Parking Garage: $0.39/square foot

Pursuant to California Government Code Section 65995, the payment of these fees by a developer serves to mitigate to a less-than-significant level all potential impacts on school facilities that may result from implementation of a project.[5]

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3 State of California, Office of Public School Construction, School Facility Program Guide, October 24, 2012.

4 City of Los Angeles Department of Building and Safety, Building Permit Fee Estimate Calculator, 2018, http://netinfo.ladbs.org/feecalc.nsf/3950786566dd7fcc88258152007def26?OpenForm, accessed July 12, 2018. As noted on this website, school district fees are subject to change without notice and are finally determined at the time of application for a building permit.

5 California Government Code Section 65996.

(3) LAUSD Facilities Service Division Strategic Execution Plan

The LAUSD Facilities Services Division (FSD) is responsible for the execution of the District's voter-approved school construction bond programs, the maintenance and operations of schools, the utilization of existing assets, and master planning for future capital projects. The FSD provides an annual update on bond program expenditures in its Strategic Execution Plan.

As stated in the 2019 Strategic Execution Plan,[6] the primary goal of the bond program was originally the reduction of overcrowding through the provision of opportunities for students to attend neighborhood schools operating on a traditional, two-semester calendar. The goal was met with the development of 131 new schools for K-12 students, allowing students to attend schools in their neighborhoods that operate on a traditional two-semester calendar. Additional new construction projects were developed that were not necessary to meet the goal, but to further relieve overcrowding, reduce reliance on portable classrooms, and to improve school facilities. The bond program is now focused on improving equity between newer and older schools so that every student has an equal opportunity for success. The next phase will guide development of projects to modernize schools, build school additions in growing neighborhoods, address critical repairs and safety issues, upgrade technology infrastructure and systems, and improve accessibility under the Americans with Disabilities Act. The bond program now includes more than $5.3 billion in projects that are underway.

b) Existing Conditions

The LAUSD is the largest public school system in California and the second-largest in the United States, in terms of number of students. The LAUSD encompasses approximately 710 square miles and serves the City, all or portions of 26 other cities, as well as several unincorporated areas of Los Angeles County. As of 2017-2018 school year, approximately 4.8 million persons live within the District's boundaries.[7] The LAUSD provides kindergarten through high school (K–12) education and adult education. As of the 2017-2018 school year, it served a total enrollment of 558,696 K-12 students, not including adult education, and a total enrollment of 713,871 students including adult education. Students are enrolled in LAUSD's 1,306 schools and centers, including, but not limited to, 19 primary school centers, 448 elementary schools, 81 middle schools, 94 high schools, 49 magnet schools, 13 special education schools, and 224 charter schools.[8] LAUSD also has a K-12 Open Enrollment process wherein parents or guardians who

6 LAUSD, Facilities Services Division, Strategic Execution Plan, 2019.
7 LAUSD, Fingertip Facts 2017-2018, updated October 2017.
8 LAUSD, Fingertip Facts 2017-2018, updated October 2017.

reside within the LAUSD service area can enroll their children at a school other than their current school of attendance.[9] For the 2017-2018 school year, the LAUSD employed 60,240 personnel, nearly half (43 percent) of whom are classroom teachers.[10] The LAUSD's Fiscal Year 2017-2018 total budget was approximately $7.52 billion.[11] Outside of LAUSD, students may also attend non-LAUSD public schools, including charter schools, magnet schools, pilot schools, and private schools.

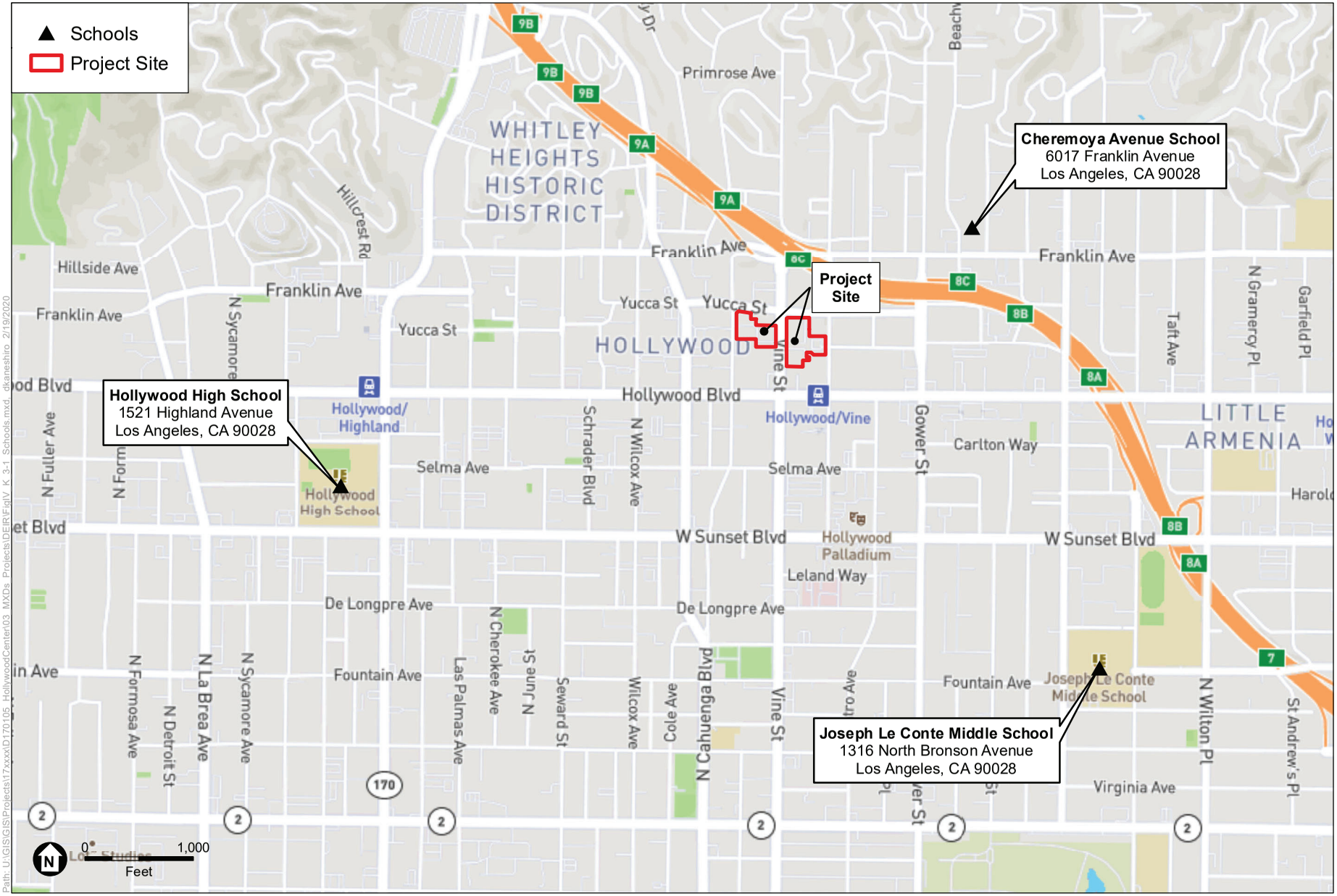
The LAUSD is divided into six local districts (Central, East, Northeast, Northwest, South, West), with the Project Site being located in the Local District West.[12] Attendance boundaries for LAUSD schools are determined based on the number of miles in a school's area, the local geography, and projected capacities and enrollments. Changes in attendance boundaries are based on maintaining an equitable balance of enrollment against capacity between schools, or to assign students from an overcrowded school to an adjacent school with space to accommodate additional students. These attendance boundaries are intended to relieve overcrowding, to plan for enrollment increases anticipated from new housing, and to address safety issues.[13]

As shown in **Figure IV.K.3-1**, *Schools Located in the Vicinity of the Project Site,* the Project Site is located within the attendance boundaries of Cheremoya Avenue Elementary School, Joseph Le Conte Middle School, and Hollywood High School. These schools are currently operating on a single-track calendar in which instruction generally begins in mid-September and continues through late June.

According to LAUSD, available seating capacity is based on residential enrollment (i.e., the number of students living in a school's attendance area who are eligible to attend the resident school associated with the student's address) compared to the respective school's current capacity, regardless of the actual enrollment. The resident enrollment is a depiction of the enrollment pool of students that resident schools must be prepared to enroll and serve. Actual enrollment is based on the number of students enrolled, whether they live inside or outside of the attendance boundary.

Table IV.K.3-1, *Existing Capacity and Enrollment of LAUSD Schools Serving the Project Site,* lists the schools serving the Project Site, as well as their location, distance/direction from the Project Site, current capacity, residential and actual enrollments, and available seating capacity.

9 LAUSD, K-12 Open Enrollment, https://achieve.lausd.net/K12OpenEnrollment, accessed May 10, 2019.
10 LAUSD, Fingertip Facts 2017-2018, updated October 2017.
11 LAUSD, Fingertip Facts 2017-2018, updated October 2017.
12 LAUSD, Local District West Map, dated May 2015.
13 LAUSD, LAUSD's Boundary Planning Process, revised July 2015.



SOURCE: Open Street Map, 2017; LAUSD, 2019

Hollywood Center Project

Figure IV.K.3-1
Schools Located in the Vicinity of the Project Site

TABLE IV.K.3-1
EXISTING CAPACITY AND ENROLLMENT OF LAUSD SCHOOLS SERVING THE PROJECT SITE

School	Approximate Distance/ Direction From Project Site [a]	2017-2018 Capacity [b]	Resident Enrollment [c]	Actual Enrollment [d]	Current Seating Overage (shortage) [e]	Overcrowded Status [f]
Cheremoya Avenue Elementary School (K-6)	0.29 miles northeast	392	318	296	74	No
Joseph Le Conte Middle School (6-8)	0.68 miles southwest	601	1,099	836	(498)	Yes
Hollywood High School (9-12)	0.66 miles southeast	1,510	1,234	1,535	276	No

[a] Approximate distance/direction from Project Site in miles is a straight line distance from the closest Project Site boundary to the respective school, not a drive distance.

[b] School's current operating capacity, or the maximum number of students the school can serve while operating on its current calendar. Excludes capacity allocated to charter co-locations. Includes capacity for magnet program.

[c] The total number of students living in the school's attendance area and who are eligible to attend the school. Includes magnet students. Multi-track calendars are utilized as one method of providing relief to overcrowded schools by increasing enrollment capacities.

[d] The number of students actually attending the school presently, including magnet students.

[e] Current capacity minus residential enrollment.

[f] A school is considered overcrowded if the school currently has a seating shortage and/or there is currently a seating overage of less than or equal to a "safety margin" of 20 seats.

SOURCE: Rena Perez, Director, LAUSD, letter correspondence dated January 7, 2019. Provided in Appendix M-3 of this Draft EIR.

Per LAUSD methodology, available seating is determined by subtracting its current resident enrollment from its current capacity. A positive result indicates that the school has a surplus of seats (which means the school is operating within capacity and has seating availability), while a negative result indicates that the school has a shortage of seats (which means the school is overcrowded). According to LAUSD, a school is considered overcrowded if the school currently has a seating shortage and/or there is currently a seating overage of less than or equal to a "safety margin" of 20 seats.[14]

As shown in Table IV.K.3-1, which is based on the information that is available from the LAUSD,[15] both the Cheremoya Avenue Elementary School and the

[14] Rena Perez, Director, LAUSD, letter correspondence dated January 7, 2019. Provided in Appendix M-3 of this Draft EIR.

[15] Rena Perez, Director, LAUSD, letter correspondence dated January 7, 2019. Provided in Appendix M-3 of this Draft EIR.

Hollywood High School are currently operating within capacity, while the Joseph Le Conte Middle School is considered overcrowded.

The Cheremoya Avenue Elementary School has a current capacity of 392 students and a residential enrollment of 318 students, resulting in an estimated available capacity of 74 seats. The Joseph Le Conte Middle School has a current capacity of 601 students and a residential enrollment of 1,099 students, resulting in an estimated shortage of capacity of 498 students. Hollywood High School has a current capacity of 1,510 students and a residential enrollment of 1,234 students, resulting in an estimated available capacity of 276 seats.[16] Based on the LAUSD criteria, Joseph Le Conte Middle School is currently considered overcrowded.[17] This assessment takes into account portable classrooms at each school site, additions to existing schools that are planned or under construction, student permits and transfers, specific educational programs running at the schools, and any other operational activities or educational programming that affect the capacity of and enrollment in LAUSD schools. LAUSD has confirmed that no new schools are planned in the Project Site's attendance boundaries.[18] Additionally, there are multiple schools in the Project Site vicinity that are not designated by LAUSD as being schools that would serve the Project Site based on service boundaries. Selma Avenue Elementary is a LAUSD pre-K through 5th grade school located approximately 0.37 miles southwest of the Project Site. Helen Bernstein High School is a LAUSD school located approximately 0.75 miles southeast of the Project Site. These additional schools could help to minimize capacity issues at the schools currently designated by LAUSD to serve the Project Site.

All strategies regarding how to accommodate additional students generated by the Project are under the control of LAUSD. Some of these strategies include changes in attendance boundaries and grade reconfigurations. Additionally, the number of Project-generated students that would actually attend the LAUSD schools serving the Project Site may be less than expected since the analysis does not take into account options to allow Project-generated students to receive education elsewhere.

16 As noted in Table IV.K.3-1, the actual enrollment for Hollywood High School is higher than the resident enrollment because Hollywood High School has a smaller number of eligible resident students who live inside the attendance area than the larger number of students enrolled who live outside the attendance boundary.

17 Rena Perez, Director, LAUSD, letter correspondence dated January 7, 2019. Provided in Appendix M-3 of this Draft EIR.

18 Rena Perez, Director, LAUSD, letter correspondence dated January 7, 2019. Provided in Appendix M-3 of this Draft EIR.

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to schools if it would:

Threshold (a): 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 schools.

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions. The factors used to evaluate school impacts include:

- The population increase resulting from the proposed project, based on the increase in residential units or square footage of non-residential floor area;
- The demand for school services anticipated at the time of project build-out compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAUSD services (facilities, equipment, and personnel) and the project's proportional contribution to the demand;
- Whether (and the degree to which) accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions which would create a temporary or permanent impact on the school(s); and
- Whether the project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).

b) Methodology

The analysis of enrollment effects on schools is based in part on the ability of LAUSD school facilities and services to accommodate the potential increase in students generated from development of the Project. The analysis estimates the number of students that would be generated by the Project using LAUSD student generation rates,[19] and considers whether LAUSD school facilities that serve the Project Site would have sufficient available capacity to accommodate these students at the time of Project buildout. School planning for future enrollments is

19 LAUSD, 2018 Developer Fee Justification Study, March 2018.

done by the LAUSD at five-year intervals, and is based on the estimated future residential enrollment (i.e., estimated number of eligible resident students). Current and projected enrollments/capacities use the 2017-2018 school year as a baseline, as that is the most recent available information. The analysis addresses three levels of education facilities operated by LAUSD (i.e., elementary, middle, and high schools), and is centered on those schools that serve the Project Site. It also considers state regulations (i.e., SB 50) and development fees as a mechanism for providing school facilities and addressing school impacts of the Project.

No existing housing or other commercial uses, outside of the existing Capitol Records Complex are located on the Project Site that would place demand on schools serving the Project Site. The majority of the Project Site consists of surface parking, which does not generate a student population. The AMDA-leased building on the West Site is used on a daily basis for sets and props; however, no LAUSD students are currently generated by this use. The existing visitors and employees associated with the Capitol Records Complex would not be affected by the Project. Therefore, it is assumed that all students generated by the Project would represent an increase over current conditions.

Immediately north of the West Site bordering Yucca Street is a five-story mixed-use building currently occupied by The American Musical and Drama Academy (AMDA). On the north side of Yucca Street is the 8-story Marsha Toy building that is also currently occupied by AMDA. Although AMDA is an established educational institution, AMDA is not a public educational institution and does not provide school services to the public. As such, potential impacts of the Project related to school services with respect to AMDA are not considered. However, as a school use, AMDA is considered a sensitive receptor in other appropriate analyses in this EIR (i.e., Section IV.B, *Air Quality,* and Section IV.I, *Noise*).

c) Project Design Features

No specific Project Design Features are proposed with regard to schools.

d) Analysis of Project Impacts

Threshold (a): Would the Project result in a substantial adverse physical impact associated with the provision of new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?

Construction activities would be essentially the same under the Project and the Project with the East Site Hotel Option. Accordingly, Project-related construction

impacts under Threshold (a) would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the construction impact analysis presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

During operation, the Project and the Project with the East Site Hotel Option would result in a different number of students generated. Therefore, a separate schools impact analysis is provided for the Project with the East Site Hotel Option under Threshold (a). However, conclusions regarding the impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

(1) Impact Analysis

(a) Construction Impacts

Construction of the Project would require employees who are anticipated to be hired from a mobile regional construction work force that moves from project to project. Typically, construction workers pass through various development projects on an intermittent basis as their particular trades are required. Given the mobility and temporary durations of work at a particular site, and a large construction labor pool that can be drawn upon in the region, construction employees would not be expected to relocate residences (and, therefore, a student population) within this region or move from other regions as a result of their temporary work on the Project Site. Therefore, Project construction would not result in a notable increase in the resident population or generate new students needing to attend local schools.

There are no public schools located in the immediate Project vicinity that would be affected by the physical construction activities at the Project Site. The nearest LAUSD school, Cheremoya Avenue Elementary School, is located approximately 0.29 miles east of the Project Site. There would be no Project-related construction staging or road closures at or adjacent to this or any other school. Therefore, construction activities would not adversely affect the operation of nearby schools.

Project construction would not result in substantial adverse physical impacts associated with the provision of new or physically altered schools, the construction of which would cause significant environmental impacts. Therefore, the Project's construction impacts on schools would be less than significant.

(b) Operational Impacts

(i) Project

The Project would include up to 1,005 residential units (872 market-rate units and 133 senior affordable units) and approximately 30,176 square feet of restaurant/retail space.

Based on the LAUSD student population generation rates, the number of students that could be generated by the Project is illustrated in **Table IV.K.3-2**, *Estimated Number of Students Generated by the Project*. As shown, the Project could generate 239 elementary school students, 65 middle school students, and 137 high school students for a total increase of 441 school students.

TABLE IV.K.3-2
ESTIMATED NUMBER OF STUDENTS GENERATED BY THE PROJECT

Land Use	Development	Units	Elementary School	Middle School	High School	Total
Proposed Uses						
Residential Multi-Family[a]	1,005	units	229	62	131	422
Restaurant/Retail[b]	30,176	sf	10	3	6	19
Total New Students			**239**	**65**	**137**	**441**

NOTE:

All student generation calculations rounded up the next whole number to provide conservative analysis.

[a] Student generation rates per household for residential uses are based on Table 3 of the LAUSD 2018 Developer Fee Justification Study: Elementary = 0.2269; Middle School = 0.0611; High School = 0.1296.

[b] For the restaurant/retail uses, the student generation rate of 0.610 student per 1,000 square-feet is based on the Neighborhood Shopping Centers rate as provided in Table 15 of the LAUSD 2018 Developer Fee Justification Study. Since the LAUSD Developer Fee Justification Study does not specify which grade levels students fall within for non-residential land uses, the students generated by the restaurant/retail uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 54 percent elementary school, 15 percent middle school, and 31 percent high school).

SOURCE: ESA, 2020.

The Project's projected student generation is likely to be less than estimated in the above analysis, which is based on LAUSD student generation factors. This is because the LAUSD generation factors do not differentiate between one- or two-bedroom units and three-bedroom units. Because 87 percent of the proposed multi-family residential units are one-bedroom apartments (482 units) and two-bedroom apartments (391 units) it is likely that the Project would generate fewer students than estimated. This analysis is also conservative in that it assumes that none of the future Project residents with families would already have students attending the schools that would serve the Project Site. Additionally, the analysis treats the Senior Affordable housing units as market-rate units even though they are unlikely to generate additional school-aged residents.

Furthermore, there is potential that a portion of the Project's school-aged children could attend non-LAUSD schools (e.g., private or charter schools), thus reducing attendance at LAUSD schools. For these reasons, this analysis is considered

conservative and likely overestimates the Project's actual potential to generate new students.

As previously discussed, the analysis assumes students generated by the Project would attend Cheremoya Avenue Elementary School, Joseph Le Conte Middle School, and Hollywood High School. LAUSD projections for those schools that serve the Project Site are unchanged from 2017-2018, as no expansion of these schools is planned for the foreseeable future, and projected enrollments for Project buildout year of 2027.[20]

Information regarding LAUSD projections' capacities and anticipated enrollments at the local schools are shown in **Table IV.K.3-3**, *Projected Capacity and Enrollment of LAUSD Schools Serving the Project Site (2027)*.

TABLE IV.K.3-3
PROJECTED CAPACITY AND ENROLLMENT OF LAUSD SCHOOLS SERVING THE PROJECT SITE WITH THE PROJECT (2027)

School	Projected Capacity[a]	Projected Enrollment[b]	Projected Seating Availability/ (Shortage)[c]	Students Generated by the Project[d]	Projected Enrollment With Project	Anticipate Capacity/ (Shortage)[c] With Project	Overcrowding Projected in Future[f]
Cheremoya Avenue Elementary School (K-6)	392	340	52	239	579	(187)	Yes
Joseph Le Conte Middle School (6-8)	601	1,015	(414)	65	1,080	(479)	Yes
Hollywood High School (9-12)	1,510	1,127	383	137	1,264	246	No

[a] School planning capacity. Formulated from a baseline calculation of the number of eligible classrooms after implementing LAUSD operational goals and shifting to a two-semester (single-track) calendar. Per LAUSD correspondence no new school construction is planned and the data in this report already take into account: portable classrooms on site, additions being built onto existing schools, student permits and transfers, programs serving choice areas, and any other operational activities or educational programming affecting the operating capacities and enrollments among LAUSD schools. Therefore, existing and projected capacity remains unchanged for projected project build-out year. Includes capacity allocated to by charter co-locations and capacity for magnet programs.

[b] Projected 5-year total number of students living in the school's attendance areas and who are eligible to attend the school. Includes magnet students.

[c] Projected seating availability or shortage is equal to the projected capacity minus projected enrollment with the Project's generated students.

[d] Number of students generated by the Project is provided in Table IV.K.3-2.

[e] The total school and calculated total capacities and enrollments for school choice areas are reported to show current and projected seating availability/shortage and overcrowding.

[f] A school is considered overcrowded if the school currently has a seating shortage and/or there is currently a seating overage of less than or equal to a "safety margin" of 20 seats.

SOURCE: Rena Perez, Director, LAUSD, letter correspondence dated January 7, 2019. Provided in Appendix M-3 of this Draft EIR; ESA, 2019.

[20] Gwenn Godek, CEQA Advisor, LAUSD, additional email correspondence dated January 11, 2019. Provided in Appendix M-3 of this Draft EIR.

As shown in Table IV.K.3-3, upon buildout and occupancy, overcrowding is projected to continue, as it in the 2017-2018 school year at Joseph Le Conte Middle School. The Project is anticipated to generate a student population that results in an exceedance of available capacity at two schools that serve the Project Site: Cheremoya Avenue Elementary School and Joseph Le Conte Middle School.[21] Hollywood High School would have an available remaining capacity of 246 seats after the Project-generated student population and, therefore, would not be substantially affected. It is conservatively anticipated that the Project would contribute 239 elementary school students to Cheremoya Avenue Elementary School, resulting in a shortage of available capacity by 187 seats. Joseph Le Conte Middle School, which as of 2017-2018 is already operating above capacity, would further exceed capacity by an estimated 479 students with the Project-generated students. As previously discussed, Project-related student generation is likely to be less than estimated in the above analysis.

LAUSD continually monitors enrollment numbers at all schools within the District. Seating shortages can be addressed through changes in attendance boundaries and new/expanded school facilities. Additionally, actual enrollment tends to run lower than the residential enrollment, which is used in the projections above and is based on the number of students living in a school's attendance area. Nonetheless, based on the above, Project implementation could require new or expanded school facilities. Because the location and operational characteristics of any new or expanded school facilities have not yet been identified by LAUSD to specifically serve the Project,[22] it would be speculative to determine how any future shortages would be addressed, including where and what those facilities may be. Therefore, at such time as the school facilities are identified by LAUSD, the environmental impacts of those facilities would be evaluated by LAUSD under CEQA as a project independent of the Project.

As discussed above, LAUSD's bond program funds improvements and upgrades to LAUSD school facilities. In addition, pursuant to California Government Code Section 65995, the Project Applicant would be required to pay fees in accordance with SB 50. Payment of such fees is intended for the general purpose of addressing the construction of new school facilities, whether schools serving the Project in question are at capacity or not. Pursuant to California Government Code Section 65995(h), payment of such fees is deemed full mitigation of a project's

21 Rena Perez, Director, LAUSD, letter correspondence dated January 7, 2019. Provided in Appendix M-3 of this Draft EIR.

22 Rena Perez, Director, LAUSD, letter correspondence dated January 7, 2019. Provided in Appendix M-3 of this Draft EIR.

development impacts.[23] **Therefore, the Project's operational impacts on schools would be less than significant.**

(ii) Project with the East Site Hotel Option

The Project with the East Site Hotel Option would develop 884 residential housing units (768 market-rate units and 116 senior affordable housing units), a 220-room hotel with approximately 130,278 square feet of floor area, and 30,176 square feet of other commercial floor area (retail and restaurant uses). Based on the LAUSD generation rates, the number of students that could be generated by the Project with the East Site Hotel Option is presented in **Table IV.K.3-4**, *Estimated Number of Students Generated by the Project with the East Site Hotel Option*. As shown, the Project with the East Site Hotel Option could generate 229 elementary school students, 63 middle school students, and 132 high school students for a total increase of 424 school students.

As shown in Table IV.K.3-4, the Project with the East Site Hotel Option would generate less students than the Project. Accordingly, Cheremoya Avenue Elementary School and Hollywood High School would have available capacity similar to the Project. Also, similar to the Project, Joseph Le Conte Middle School, which as of 2017-2018 is already operating above capacity, would further exceed capacity with new students generated by the Project with the East Site Hotel Option. However, for the same reasons as analyzed above, operation of the Project with the East Site Hotel Option would not result in substantial adverse physical impacts associated with the provision of new or physically altered schools, the construction of which would cause significant environmental impacts.

(i) Conclusion

The Project and the Project with the East Site Hotel Option would not result in substantial adverse physical impacts associated with the provision of new or physically altered schools, the construction of which would cause significant environmental impacts. Therefore, operational impacts on schools would be less than significant.

(2) Mitigation Measures

Impacts regarding schools were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

[23] California Government Code Section 65995(h) states in part: "The payment or satisfaction of a fee …specified in Section 65995 …are hereby deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property … on the provision of adequate school facilities.

TABLE IV.K.3-4
ESTIMATED NUMBER OF STUDENTS GENERATED BY THE PROJECT WITH THE EAST SITE HOTEL OPTION

Land Use	Development	Units	Elementary School	Middle School	High School	Total
Proposed Uses						
Residential Multi-Family[a]	884	units	201	55	115	371
Restaurant/Retail[b]	30,176	sf	10	3	6	19
Hotel[c]	130,278	sf	18	5	11	34
Total New Students			**229**	**63**	**132**	**424**

NOTE:

All student generation calculations rounded up the next whole number to provide conservative analysis.

[a] Student generation rates per household for residential uses are based on Table 3 of the LAUSD 2018 Developer Fee Justification Study: Elementary = 0.226 9; Middle School = 0.0611; High School = 0.1296.

[b] For the restaurant/retail uses, the student generation rate of 0.610 student per 1,000 square feet is based on the Neighborhood Shopping Centers rate as provided in Table 15 of the LAUSD 2018 Developer Fee Justification Study. Since the LAUSD Developer Fee Justification Study does not specify which grade levels students fall within for non-residential land uses, the students generated by the restaurant/retail uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 54 percent elementary school, 15 percent middle school, and 31 percent high school).

[c] For the hotel use, the student generation rate of 0.254 student per 1,000 square feet is based on the Lodging rate as provided in Table 15 of the LAUSD 2018 Developer Fee Justification Study. Since the LAUSD Developer Fee Justification Study does not specify which grade levels students fall within for non-residential land uses, the students generated by the restaurant/retail uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 54 percent elementary school, 15 percent middle school, and 31 percent high school).

SOURCE: ESA, 2020.

(3) Level of Significance After Mitigation

Impacts regarding schools were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

The Project would result in a student generation of approximately 441 students, while the Project with the East Site Hotel Option would result in approximately 424 students, or 17 fewer students. Therefore, the Project's higher student generation is analyzed herein to provide a conservative analysis of cumulative impacts. However, conclusions regarding the cumulative impact analysis and impact significance for the Project presented below are the same and also apply to the Project with the East Site Hotel Option.

(1) Impact Analysis

Chapter III, *Environmental Setting*, of this Draft EIR, identifies 150 related projects in the vicinity of the Project Site. For purposes of this cumulative impact analysis on schools, only those related projects located within the attendance boundaries of the schools serving the Project Site (Cheremoya Avenue Elementary School, Joseph Le Conte Middle School, and Hollywood High School) have been considered. Of the 150 related projects identified in Chapter III, 123 are located within the City of Los Angeles and 27 are located within the City of West Hollywood. Certain related projects that are located within the City of West Hollywood are within LAUSD's service boundaries. Of the 150 related projects, 112 are located within the attendance of one or more of the three schools serving the Project Site and are included in the estimate of students generated by the related projects.[24]

Similar to the Project, the number of students anticipated to be generated by related projects was based on the type of development proposed. **Table IV.K.3-5**, *Cumulative Student Generation*, shows the number of students projected to be generated by the related projects by the schools within the same attendance boundaries of the schools serving the Project Site. As shown in Table IV.K.3-5, the applicable related projects would potentially generate 9,535 students at Cheremoya Elementary School, 2,623 students at Joseph Le Conte Middle School, and 5,465 students at Hollywood High School. As stated above, the Project with the East Site Hotel Option would result in fewer students than the Project, therefore, the Project's higher student generation is analyzed herein to provide a conservative analysis of cumulative impacts. The Project, in conjunction with the related projects, would therefore generate 9,774 students at Cheremoya Avenue Elementary School, 2,688 students at Joseph Le Conte Middle School, and 5,602 students at Hollywood High School. As further explained below, these are conservative estimates.

Table IV.K.3-6, *Projected Capacity and Enrollment of LAUSD Schools with Cumulative Development (2027)*, illustrates the cumulative impacts on projected enrollment, capacity, and seating at Cheremoya Avenue Elementary School, Joseph Le Conte Middle School, and Hollywood High School. Based on the 2026-2027[25] projected seating capacity estimates provided by LAUSD, Cheremoya Avenue Elementary School would have a shortage of 9,722 seats. Joseph Le Conte Middle School would have a shortage of 3,102 seats. Hollywood High School would have a shortage of 5,219 seats. Cumulative development, therefore,

[24] The following related projects within the City of Los Angeles are located outside of the attendance boundaries of one or more of the schools serving the Project Site: 78, 81, 87, 88, 89, 93, 101, 102, 103, 104, 105, 106, 109, 110, 111, 112, 113, 115, 116, 118, 119, 120, 121, and 123. The following related projects within the City of West Hollywood are located outside of the attendance boundaries of one or more of the schools serving the Project Site: 10, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27.

[25] Gwenn Godek, CEQA Advisor, LAUSD, additional email correspondence dated January 11, 2019. Provided in Appendix M-3 of this Draft EIR.

has the potential to generate more students than the LAUSD-determined schools are projected to be able to accommodate.

TABLE IV.K.3-5
CUMULATIVE STUDENT GENERATION

Land Use	Development	Units	Elementary School	Middle School	High School	Total
Residential Multi-Family[a]	14,721	units	3,341	900	1,908	6,149
Retail[b]	3,136.64	ksf	1,034	288	594	1,916
Office[b]	4,453.20	ksf	2,590	720	1,487	4,797
Industrial[b,c]	5,299.96	ksf	2,267	630	1,302	4,199
Hotel[b,d]	2,206	ksf	303	85	174	562
Total Students Generated by Related Projects[e]			*9,535*	*2,623*	*5,465*	*17,623*
Total Students Generated by Project			*239*	*65*	*137*	*441*
Total Increase (Project + Related Projects)			**9,774**	**2,688**	**5,602**	**18,064**

NOTE:

All student generation calculations rounded up the next whole number to provide conservative analysis.

[a] Student generation rates per household for residential uses Table 3 of the LAUSD 2018 Developer Fee Justification Study: Elementary = 0.2269; Middle School = 0.0611; High School = 0.1296.

[b] For the retail uses, the student generation rate of 0.610 student per 1,000 square feet is based on the Neighborhood Shopping Centers rate as provided in Table 15 of the LAUSD 2018 Developer Fee Justification Study. For the office uses, the student generation rate of 1.077 student per 1,000 square foot is based on the Standard Commercial Office rate. For the industrial uses, the student generation rate of 0.792 student per 1,000 square foot is based on the Industrial Business Parks rate. For the hotel uses, the student generation rate of 0.254 student per 1,000 square foot is based on the Lodging rate. Since the LAUSD Developer Fee Justification Study does not specify which grade levels students fall within for non-residential land uses, the students generated by the restaurant/retail uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 54 percent elementary school, 15 percent middle school, and 31 percent high school).

[c] As there are no separate generation rates for particular uses (e.g., event facility, parks, other, etc.), the industrial generation rates were used.

[d] It is assumed that each hotel room is approximately 500 square feet.

SOURCE: ESA, 2020.

As previously discussed, LAUSD has determined that no new schools are planned in the Project Site's attendance boundaries. The calculations of the schools' capacity and shortages take into account portable classrooms at each school site, additions to existing schools that are planned or under construction, student permits and transfers, specific educational programs running at the schools, and

any other operational activities or educational programming that affect the capacity of and enrollment in LAUSD schools.[26]

TABLE IV.K.3-6
PROJECTED CAPACITY AND ENROLLMENT OF LAUSD SCHOOLS WITH CUMULATIVE DEVELOPMENT (2027)

School	Projected Capacity[a]	Projected Enrollment[b]	Projected Seating Availability/ (Shortage)[c]	Project+ Cumulative Project Generated Students[d]	Projected Enrollment With Project+ Cumulative Projects	Projected Seating Availability/ (Shortage) With Project+ Cumulative Projects[e]
Cheremoya Avenue Elementary School (K-5)	392	340	52	9,774	10,114	(9,772)
Joseph Le Conte Middle School (6-8)	601	1,015	(414)	2,688	3,703	(3,102)
Hollywood High School (9-12)	1,510	1,127	383	5,602	6,729	(5,219)

[a] School planning capacity. Formulated from a baseline calculation of the number of eligible classrooms after implementing LAUSD operational goals and shifting to a two-semester (single-track) calendar. Includes capacity allocated to by charter co-locations and capacity for magnet programs.

[b] Projected 5-year total number of students living in the school's attendance areas and who are eligible to attend the school. Includes magnet students.

[c] Projected seating availability/(shortage) is equal to the projected capacity minus projected enrollment.

[d] Cumulative totals for the number of generated students including the Project are found in Table IV.K.3-5 above.

[e] Projected Seating Availability/(Shortage) With Project + Cumulative Projects is equal to the projected capacity minus the Projected Enrollment with Project + Cumulative Projects.

SOURCE: Rena Perez, Director, LAUSD, letter correspondence dated January 7, 2019. Provided in Appendix M-3 of this Draft EIR; ESA, 2019.

Similar to the Project, the impacts of cumulative development on local schools is likely to be overstated, since the projected population increase from cumulative projects is conservative and overstated. As with the Project, projected student generation is likely to be less than estimated in the above analysis, as it assumes that none of the future residents or employees with families would already have students attending the schools listed above. This analysis also does not take into account projects that would not be constructed and occupied within the timeframe analyzed, projects that may be reduced in size, or demolition of existing housing or uses to accommodate the planned new development. Finally, actual enrollment

[26] Rena Perez, Director, Los Angeles Unified School District (LAUSD), letter correspondence dated January 7, 2019. Provided in Appendix M-3 of this Draft EIR.

tends to run lower than the residential enrollment, which is based on the number of students living in a school's attendance area. In addition, the future LAUSD enrollment estimates already account for at least some growth that may be inclusive of the cumulative projects cited above. For these reasons, the above analysis is considered conservative and likely overestimates the Project's actual potential to generate new students.

Based on the analysis, the Project, in combination with the related projects, could require new or expanded school facilities. However, LAUSD continually monitors enrollment numbers at all schools within the District, and seating shortages can be addressed through changes in attendance boundaries and new/expanded school facilities. Provided that the location and operational characteristics of any new or expanded school facilities have not yet been identified by LAUSD to specifically serve the Project[27] and the related projects, it would require speculation to determine how any future shortages would be addressed, including where and what those facilities may be. Therefore, at such time as the school facilities are identified by LAUSD, the environmental impacts of those facilities would be evaluated by LAUSD under CEQA as a project independent of the Project.

As with the Project, pursuant to California Government Code Section 65995, all related projects would be required to pay developer fees under the provisions of SB 50 to address the impacts of new development on school facilities. Payment of such fees is intended for the general purpose of addressing the construction of school facilities, whether schools serving the Project in question are at capacity or not. Pursuant to California Government Code Section 65995(h), payment of such fees is deemed full mitigation of a project's development impacts. In addition, a portion of the property taxes generated by the Project and related projects would be allocated by the State to LAUSD for future school operations. This would be in addition to LAUSD's bond program that funds improvements and upgrades to LAUSD school facilities.

With the payment of the developer fees under the provisions of SB 50, the Project and related projects would not result in a substantial adverse physical impact associated with the provision of new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable performance objectives for schools. **Therefore, the Project and the Project with the East Site Hotel Option's incremental contribution towards school impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.**

27 Rena Perez, Director, Los Angeles Unified School District (LAUSD), letter correspondence dated January 7, 2019. Provided in Appendix M-3 of this Draft EIR.

(2) Mitigation Measures

Cumulative impacts regarding schools were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts regarding schools were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

IV. Environmental Impact Analysis

K.4 Public Services – Parks and Recreation

1. Introduction

This section analyzes the potential impacts of the Project on public parks and recreational facilities. The demand for existing parks and recreational facilities by Project residents is evaluated in light of the open space and recreational facilities to be provided as part of the Project. This section also analyzes the Project's consistency with applicable City of Los Angeles (City) recommendations and regulatory requirements regarding the need for such facilities. Information and analysis in this section are based, in part, on existing service ratios, existing parks and recreational facilities, and other information provided by the City of Los Angeles Department of Recreation and Parks (RAP) and provided in Appendix M-4 of this Draft EIR.[1]

2. Environmental Setting

a) Regulatory Framework

(1) State

California Government Code Section 66477, also known as the Quimby Act, was enacted by the California legislature in 1965 to promote the availability of park and open space areas in response to California's rapid urbanization and the need to preserve open space and provide parks and recreational facilities in response to this urbanization. The Quimby Act authorizes cities and counties to enact ordinances requiring the dedication of land, or the payment of fees for park and/or recreational facilities in lieu thereof, or both, by developers of residential subdivisions as a condition to the approval of a tentative map or parcel map. Under the Quimby Act, dedications of land shall not exceed three acres of parkland per 1,000 persons residing within a subdivision, and in-lieu fee payments shall not exceed the proportionate amount necessary to provide three acres of parkland, unless the amount of existing neighborhood and community parkland exceeds that limit. Los Angeles Municipal Code (LAMC) Section 12.33

[1] Darryl Ford, Senior Management Analyst II, Planning, Maintenance, and Construction Branch, City of Los Angeles Department of Recreation and Parks (RAP), letter correspondence dated October 11, 2018. Provided in Appendix M-4 of this Draft EIR.

was authorized to support compliance with the Quimby Act and provide a mechanism for increasing park and recreational facilities available for the City's residents. Section 12.33 of the LAMC is discussed further below.

(2) Local

(a) City of Los Angeles Charter

The City Charter established the RAP to construct, maintain, operate, and control all parks, recreational facilities, museums, observatories, municipal auditoriums, sports centers and all lands, waters, facilities or equipment set aside or dedicated for recreational purposes and public enjoyment within the City. The Board of Recreation and Parks Commissioners oversees the RAP.

With regard to control and management of recreation and park lands, Section 594(c) of the City Charter provides that all lands set apart or dedicated as a public park shall forever remain for the use of the public inviolate. However, the Board of Recreation and Parks Commissioners may authorize the use of those lands for any park purpose and for other specified purposes.

(b) City of Los Angeles General Plan Framework Element

The City's General Plan Framework Element (adopted in December 1996 and readopted in August 2001) includes park and open space policies that address recreational uses throughout the City. Policy 9.23.5 directs the RAP to "[r]e-evaluate the current park standards and develop modified standards which recognize urban parks, including multi-level facilities, smaller sites, more intense use of land, public/private partnerships and so on." In addition, Policy 9.23.8 instructs the RAP to "[p]repare an update of the General Plan Public Facilities and Services Element based on the new Los Angeles Department of Recreation and Parks standards by 2005."

(c) City of Los Angeles Open Space Element

The City's Open Space Element was prepared in June 1973 to provide an official guide to the City Planning Commission, the City Council, the Mayor, and other governmental agencies and interested citizens for the identification, preservation, conservation, and acquisition of open space in the City.[2] This document distinguishes open space areas as privately or publicly owned, and includes goals, objectives, policies, and programs directed towards the regulation of privately owned lands both for the benefit of the public as a whole, and for protection of individuals from the misuses of these lands. In addition, this document discusses the acquisition and use of publicly owned lands and recommends further implementation of studies and actions to guide development

[2] City of Los Angeles Department of City Planning, Open Space Plan, June 1973, p. 1.

of open space in the City. Furthermore, in order to address the standards and criteria of identifying open space, this document describes various contextual factors that may affect open space, including, but not limited to: recreation standards; scenic corridors; density and development; cultural or historical sites; safety, health, and social welfare; environmental and ecological balance; and unique sites.[3]

The City's General Plan Open Space Element update was formally initiated pursuant to a Council motion adopted on May 24, 2001 (Council File 96-1358) and has been undergoing revisions by the Department of City Planning.[4,5] Until approval of the pending updates to the Open Space Element, the RAP is operating under the guidance of the Public Recreation Plan (PRP) discussed below.

(d) City of Los Angeles Public Recreation Plan

Within the City's General Plan, the PRP, a portion of the Service Systems Element, establishes guidelines related to parks, recreational facilities, and open space areas in the City. Adopted in 1980 by the Los Angeles City Council[6] and amended by City Council resolution in March 2016 to modernize its recommendations and provide more flexibility and equity in the distribution of funds used for the acquisition and development of recreational resources,[7] the PRP addresses the need for publicly accessible neighborhood, community, and regional recreational sites and facilities across the City. The PRP focuses on recreational site and facility planning in underserved neighborhoods with the fewest existing resources and the greatest number of potential users (i.e., where existing residential development generates the greatest demand), as well as areas where new subdivisions, intensification of existing residential development, or redevelopment of "blighted" residential areas creates new demand.

The amended PRP establishes general guidelines for neighborhood, community, and regional recreational sites and facilities that address general service radius and access as well as service levels relative to population within that radius. The PRP also states that the allocation of acreage for community and neighborhood

3 City of Los Angeles Department of City Planning, Open Space Plan, June 1973.

4 City of Los Angeles Office of the City Clerk, Council File Number 96-1358, https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=96-1358, accessed October 25, 2018.

5 City of Los Angeles Department of City Planning, General Plan Structure: Summary of the General Plan Elements, Spring 2014.

6 City of Los Angeles, Public Recreation Plan, a portion of the Service Systems Element of the Los Angeles General Plan, approved October 9, 1980.

7 City of Los Angeles Planning Commission, Resolution amending the Public Recreation Plan of the Service Systems Element of the City of Los Angeles General Plan, March 24, 2016.

parks should be based on the resident population within that general service radius. Toward this end, the amended PRP recommends the goals of 2.0 acres each of neighborhood and community recreational sites and facilities per 1,000 residents, and 6.0 acres of regional recreational sites and facilities per 1,000 residents. To determine existing service ratios, the RAP commonly uses the geographic area covered by the applicable Community Plan rather than the park service radius.[8] The PRP does not establish requirements for individual development projects.

For a given neighborhood recreational site or facility, the amended PRP does not recommend a specific size, noting only that a school playground may partially serve this function (with up to one-half of its acreage counted toward the total acreage requirement [service level per capita]). The amended PRP does not define a specific service radius for neighborhood recreational sites and facilities, instead recommending that they should generally be within walking distance and not require users to cross a major arterial street or highway for access.[9]

For community recreational sites and facilities, the amended PRP states that facilities may be of any size, but are generally larger than neighborhood parks, and a high school site may be counted toward half the acreage requirement/service level per capita. The amended PRP does not define a specific service radius for community recreational sites and facilities, instead recommending that they should generally be accessible within a relatively short bicycle, bus, or car trip, and easily accessible.[10]

For regional recreational sites and facilities, the amended PRP states that facilities may be large urban recreational sites or smaller sites or facilities that draw visitors from across the City. The amended PRP does not define a specific service radius or further qualify access, stating only that the service radius should be that within a reasonable drive.[11]

8 City of Los Angeles, Public Recreation Plan, a portion of the Service Systems Element of the Los Angeles General Plan, approved October 9, 1980.

9 City of Los Angeles Planning Commission, Resolution amending the Public Recreation Plan of the Service Systems Element of the City of Los Angeles General Plan, March 24, 2016, p. 5.

10 City of Los Angeles Planning Commission, Resolution amending the Public Recreation Plan of the Service Systems Element of the City of Los Angeles General Plan, pp. 5 and 6.

11 City of Los Angeles Planning Commission, Resolution amending the Public Recreation Plan of the Service Systems Element of the City of Los Angeles General Plan, p. 6.

(e) Los Angeles Department of Recreation and Parks 2009 Citywide Community Needs Assessment

In 2009, the RAP completed a Citywide Community Needs Assessment (Assessment) as a preliminary step in developing a Citywide park master plan and five-year capital improvement plan. The report was envisioned as the basis for a Citywide Parks and Recreation Master/Strategic Plan and capital improvement plan, as well as the basis for longer-term planning initiatives related to parks and recreational facilities.[12]

The report provides an inventory of existing facilities, defines geographic areas of need and recommended facilities to serve specific populations, and identifies priorities for additional parks and recreation facilities, and serves as a more current assessment of conditions and future needs than the General Plan's PRP.

As stated in the Assessment, 63 percent of respondents would travel at least one mile to visit a neighborhood park, whereas 38 percent were willing to travel at least two miles. 71 percent of respondents would travel at least two miles to visit a community park, whereas 37 percent would travel more than three miles to visit a community park.[13]

The objectives of the Assessment were to (1) preliminarily prioritize and address the tremendous needs for additional recreation and park land; (2) identify existing facilities needing improvements to meet current and future community needs; (3) identify recreation program needs, perform demographic analysis, and prevent future maintenance problems; and (4) offer positive alternatives to an increasingly dense and urbanized population.[14]

The Assessment recommends Citywide service levels for the future provision of park acreage, totaling 9.60 acres of parkland per 1,000 persons Citywide:

- Mini-Parks: 0.10 per 1,000 persons
- Neighborhood Parks: 1.50 acres per 1,000 persons
- Community Parks: 2.00 acres per 1,000 persons
- Regional and Large Urban Parks: 6.00 acres per 1,000 residents

[12] RAP, 2009 Citywide Community Needs Assessment, Section 1.1.2, Purpose and Process, approved October 9, 2009, p. 3.
[13] RAP, 2009 Citywide Community Needs Assessment, approved October 9, 2009, p. 25.
[14] RAP, 2009 Citywide Community Needs Assessment, approved October 9, 2009, p. 3.

(f) City of Los Angeles Health and Wellness Element (Plan for a Healthy Los Angeles)

In March 2015, the City adopted the Plan for a Healthy Los Angeles as the Health and Wellness Element of the General Plan.[15] This plan elevates existing health-oriented policies in the General Plan and, where policy gaps exist, creates new policies to reinforce the City's goal of creating healthy, vibrant communities. With a focus on public health and safety, the plan serves as a guide for addressing quality-of-life issues, such as safe neighborhoods, a clean environment, access to health services, affordable housing, healthy and sustainably produced food, and the opportunity to thrive. This plan identifies new policies and potential programs to create healthier neighborhoods by working toward seven goals: (1) Los Angeles, a Leader in Health and Equity; (2) A City Built for Health; (3) Bountiful Parks and Open Spaces; (4) Food that Nourishes the Body, Soul, and Environment; (5) An Environment Where Life Thrives; (6) Lifelong Opportunities for Learning and Prosperity; and (7) Safe and Just Neighborhoods.

As such, this plan highlights the importance of parks and open spaces through the following objectives:

- Increase the number of neighborhood and community parks so that every Community Plan Area strives for three acres of neighborhood and community park space per 1,000 residents (excluding regional parks and open spaces).
- Increase access to parks so that 75 percent of all residents are within a 0.25-mile walk of a park or open space facility.
- Increase the number of schools (public, private, and charter) that have shared use agreements for community use outside of normal school hours by 25 percent.
- Increase the miles of the Los Angeles River that are revitalized for natural open space and physical activity, particularly in low-income areas.
- Increase the number of parks that feature or incorporate universally-accessible features.
- Improve the percentage of citywide population meeting physical fitness standards per week so that 50 percent of the population meets physical activity guidelines.

Although this plan includes an objective to reach a standard of three acres of neighborhood and community park space per 1,000 residents (excluding regional

[15] City of Los Angeles Department of City Planning, Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan, March 2015.

parks and open space), the RAP is operating under the guidance and standards of the PRP, as previously described.[16]

(g) Hollywood Community Plan

The Hollywood Community Plan was adopted in 1988 and addresses growth and the arrangement of land uses within its boundaries through the year 2010.[17] As discussed below, the 1988 plan is the most recent adopted Hollywood Community Plan and is applicable to the Project. The Hollywood Community Plan includes five policies to address the provision of recreational and parks facilities.[18] The policies are oriented toward issues regarding the provision and operations of parks by the City's service agencies; they are not necessarily oriented toward individual development projects. Two policies suggest considerations that may be taken into account in the provision of park and recreational services for individual development projects:[19]

- Policy 1 states that the desires of the local residents should be considered in the planning of recreational facilities.

- Policy 2 states that recreational facilities, programs and procedures should be tailored to the social, economic, and cultural characteristics of individual neighborhoods, with monitoring of programs and procedures.

The remaining three policies are intended to upgrade the quality of existing public park facilities and avoid housing displacement in the selection of new park sites and are not applicable to the Project.

Objective 5 of the Hollywood Community Plan provides a basis for the location and programming of public services and utilities and establishes the need to coordinate the phasing of public facilities with private development. Objective 5 also encourages open space and parks in both local neighborhoods and in high density areas.

(h) Park Proud LA Strategic Plan 2018-2022

The Park Proud LA Strategic Plan (Strategic Plan) is the most recent strategic plan for the RAP, effective from 2018 until 2022.[20] The Strategic Plan highlights critical work that needs to be accomplished over the next several years to ensure that the City has an accessible, equitable, and first class park system. The

[16] City of Los Angeles Department of City Planning, Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan, March 2015, p. 53.
[17] City of Los Angeles Department of City Planning, Hollywood Community Plan, adopted December 13, 1988, p. HO-2.
[18] City of Los Angeles Department of City Planning, Hollywood Community Plan, adopted December 13, 1988.
[19] City of Los Angeles Department of City Planning, Hollywood Community Plan, , adopted December 13, 1988, p. HO-4.
[20] RAP, Park Proud LA Strategic Plan 2018-2022.

Strategic Plan reflects chief priorities of the RAP, confronts new and existing challenges, and lays the framework to pursue new opportunities. Within the Strategic Plan, there are over two dozen outcomes organized under the following seven high-level priority goals:

- Provide safe and accessible parks;
- Offer affordable and equitable recreation programming;
- Create and maintain world class parks and facilities;
- Actively engage communities;
- Ensure an environmentally sustainable park system;
- Build financial strength and innovative partnerships; and
- Maintain a diverse and dynamic workforce.

(i) City of Los Angeles Municipal Code

In September 2016, the City adopted Ordinance No. 184,505, Parks Dedication and Fee Update Ordinance (Park Fee Ordinance).[21] The aim of the Park Fee Ordinance is to increase the opportunities for park space creation and expand the fee program beyond those projects requiring a subdivision map to include a park linkage fee for all net new residential units. The Park Fee Ordinance amends LAMC Sections 12.21[22], 12.33[23], 17.03[24], 17.12[25] and 17.58[26], deletes LAMC Sections 17.07 and 19.01, and adds LAMC Section 19.17.[27] The Park Fee Ordinance increases Quimby in-lieu fees, provides a new impact fee for non-subdivision projects, eliminates the deferral of park fees for market rate projects that include residential units, increases the fee spending radii from the site from which the fee is collected, provides for early City consultation for subdivision projects or projects with over 50 units in order to identify means to dedicate land for park space, and updates the provisions for credits against park fees. The Park

21 City of Los Angeles Department of City Planning, Ordinance No. 184,505, approved by City Council on September 7, 2016, signed by the Mayor on September 13, 2016 and published on September 19, 2016.

22 City of Los Angeles, Municipal Code Section 12.21, General Provisions.

23 City of Los Angeles, Municipal Code LAMC Section 12.33, Park Fees and Land Dedication, amended by Ordinance No. 184,505, effective January 11, 2017.

24 City of Los Angeles, Municipal Code LAMC Section 17.03, Advisory Agency, amended by Ordinance No. 150,947, effective July 3, 1978.

25 City of Los Angeles, Municipal Code LAMC Section 17.12, Parks and Recreation Site Acquisition and Development Provisions, amended by Ordinance No. 184,505, effective January 11, 2017.

26 City of Los Angeles, Municipal Code LAMC Section 17.58, Park and Recreation Site Acquisition and Development, amended by Ordinance No. 184,505, effective January 11, 2017.

27 City of Los Angeles, Municipal Code LAMC Section 19.17, Park Fee, added by Ordinance No. 184,505, effective January 11, 2017.

Fee Ordinance went into effect on January 11, 2017. The Park Fee Ordinance provides that any project that has acquired vested rights under Section 12.26 A.3[28] of the LAMC prior to the effective date of the Park Fee Ordinance and/or has an approved vesting tentative map pursuant to Section 17.15[29] of the LAMC, the application for which has been deemed complete prior to the effect date of the Park Fee Ordinance, shall not be subject to the park fees set forth in the Park Fee Ordinance. The Project's entitlement applications, including its Vesting Tentative Map application, were deemed complete on April 10, 2018, subsequent to the Park Fee Ordinance becoming effective. As such, the Project is subject to the park fee provisions of the Park Fee Ordinance. The LAMC provisions, as amended by the Park Fee Ordinance, are summarized below.

LAMC Section 12.21 G[30] requires that all residential developments containing six or more dwelling units on a lot provide, at a minimum, the following usable open space area per dwelling unit: 100 square feet for each unit having less than three habitable rooms, 125 square feet for each unit having three habitable rooms, and 175 square feet for each unit having more than three habitable rooms. LAMC Section 12.21 G also identifies what areas of a project would qualify as usable open space for the purposes of meeting the project's open space requirements.

As stated in LAMC Section 12.21 G, usable open space is defined as areas designated for active or passive recreation and may consist of private and common areas. Common open space areas must be readily accessible to all residents of the site and constitute at least 50 percent of the total required usable open space. Common open space areas can incorporate recreational amenities such as swimming pools, spas, picnic tables, benches, children's play areas, ball courts, barbecue areas, and sitting areas. A minimum of 25 percent of the outdoor common open space area must be planted with ground cover, shrubs, or trees. Indoor recreational amenities can account for up to 25 percent of the usable open space requirements. Private open space is defined in an area which is contiguous to and immediately accessible from an individual dwelling unit, may have a dimension no less than six feet in any direction and must contain a minimum of 50 square feet, of which no more than 50 square feet per dwelling unit can be counted towards the total required usable open space.

LAMC Section 12.33, Park Fees and Land Dedication, authorized under the Quimby Act requires developers of most residential projects to dedicate land

[28] City of Los Angeles, Municipal Code Section 12.26 A.3, Vesting of Development Plan, amended by Ordinance No. 173,492, effective October 10, 2000.

[29] City of Los Angeles, Municipal Code Section 17.15, Vesting Tentative Maps, added by Ordinance No. 163,300, effective March 27, 1988.

[30] City of Los Angeles, Municipal Code Section 12.21 G, Open Space Requirements for Six or More Residential Units, added by Ordinance No. 171,753, effective November 17, 1997.

and/or pay in-lieu fees for parks and recreational facilities.[31] Specific requirements are determined based on the type of project and number of units. Under LAMC Section 12.33 D, the area of land within a residential subdivision that is required to be dedicated for parks and recreational uses is determined by the formulas provide therein.[32] Land dedication and in-lieu fee payment are subject to the restrictions set forth in Section 12.33 (i.e., land must be used for park or recreational uses and fees must be used for the acquisition or development of, and not the operation or maintenance of, park land).

LAMC Section 12.33 G, Affordable Housing Exemption, allows new residential dwelling units that are rented or sold to persons or households of very low, low, or moderate income to receive an affordable housing exemption from the park fee and land dedication requirement.[33] An affordable housing unit shall receive an exemption from the requirement for dedication of land for park and recreational purposes and/or payment of the park fee if the affordable housing unit is affordable to a household at or below the 120 percent of the area median income. In projects with a mix of market-rate and affordable units, only the affordable housing units shall receive this exemption.

LAMC Section 12.33 H, Credits, allows private recreational areas developed within a project site for use by the particular project's residents to be credited as meeting up to 35 percent of the project's calculated land dedication and/or in lieu fee requirement.[34] Recreational areas that qualify under this provision of LAMC Section 12.33 H include, in part, indoor recreation areas, gyms, swimming pools, and spas (when the spas are an integral part of a pool complex). Furthermore, in accordance with LAMC Section 12.33 H.2, the recreational areas proposed as part of a project must meet the following standards in order to be credited against the requirement for land dedication: (1) each facility is available for use by all of the residents of a project; and (2) the area and the facilities satisfy the park and recreation needs of a project so as to reduce that project's need for public recreation and park facilities.[35]

LAMC Section 21.10.3, Dwelling Unit Construction Tax, establishes the payment of a dwelling unit construction tax of $200 per new residential unit.[36] The tax is to be paid to a "Park and Recreational Sites and Facilities Fund" for the

[31] Amended on September 13, 2016 (Ordinance No. 184,505), effective January 2017 on the 120th day following its adoption.

[32] City of Los Angeles, Municipal Code Section 12.33 D, Residential Subdivision Projects That Contain More Than 50 Dwelling Units, amended by Ordinance No. 184,505, effective January 11, 2017.

[33] City of Los Angeles, Municipal Code Section 12.33 G, Affordable Housing Exemption, amended by Ordinance No. 184,505, effective January 11, 2017.

[34] City of Los Angeles, Municipal Code Section 12.33 H, Credits, amended by Ordinance No. 184,505, effective January 11, 2017.

[35] City of Los Angeles, Municipal Code Section 12.33 H.2, Privately Owned Park and Recreational Facilities, amended by Ordinance No. 184,505, effective January 11, 2017.

[36] City of Los Angeles, Municipal Code Section 21.10.3, Dwelling Unit Construction Tax.

acquisition and development of park and recreational sites and facilities. If park and recreation provisions (i.e., fees, improvements, or land dedication) have been made pursuant to LAMC Section 12.33, the fair market value of those provisions is credited against the payment of this tax.

Pursuant to LAMC Sections 17.12 and 17.58, a final subdivision map shall not be approved or recorded, unless a park fee has been paid or land within the subdivision has been dedicated to the City for park or recreational purposes. Park fee rates for residential subdivision and non-subdivision residential projects are identified in LAMC Section 19.17 and adjusted for inflation annually.

b) Existing Conditions

(1) RAP Facilities and Ratios

The RAP is responsible for the establishment, operation, and maintenance of parks and recreational facilities in the City. These facilities include parks, swimming pools, public golf courses, recreation centers, museums, youth camps, tennis courts, sports programs, and programs for senior citizens. The RAP also supervises construction of new facilities and improvements to existing ones. Currently, the RAP maintains over 16,000 acres of parkland within approximately 444 regional, community and neighborhood parks, 422 playgrounds, 321 tennis courts, 184 recreational centers, 72 fitness areas, 62 swimming pools and aquatic centers, 30 senior centers, 26 skate parks, 13 golf courses, 12 museums, nine dog parks, 187 summer youth camps, and help support the Summer Night Lights gang reduction and community intervention program. The RAP supports the City's urban wilderness and open spaces by maintaining and caring for the park urban tree canopy, 13 lakes, and 92 miles of hiking trails. The RAP oversees Griffith Park and operates Venice Beach, Cabrillo Marine Aquarium, and 12 museums.[37]

The adequacy of parkland is measured in the General Plan (i.e., the PRP) in terms of acres of recreational sites and facilities per 1,000 City residents within a given service area.[38] Per recent correspondence from the RAP, the City currently has an estimated existing Citywide ratio of 0.76 acres of neighborhood and community parkland per 1,000 residents, while the Hollywood Community Plan area portion of the City has a ratio of 0.41 acres of neighborhood and community parkland per 1,000 residents.[39] The current neighborhood and community park acreage ratios Citywide and in the Hollywood Community Plan area, therefore, fall short of meeting the recommendations set forth in the PRP

[37] RAP, Who We Are, http://www.laparks.org/department/who-we-are, accessed October 25, 2018.

[38] City of Los Angeles, Public Recreation Plan, approved October 9, 1980.

[39] Darryl Ford, Senior Management Analyst II, Planning, Maintenance, and Construction Branch, City of Los Angeles Department of Recreation and Parks (RAP), letter correspondence dated October 11, 2018. Provided in Appendix M-4 of this Draft EIR.

(2.0 acres each of neighborhood and community recreational sites and facilities per 1,000 residents) and the Assessment recommendations of 1.50 acres of neighborhood parks per 1,000 residents and 2.0 acres of community parks per 1,000 residents). The estimated service level of 6.0 acres of regional and large urban parks as of 2009, per the Assessment, also falls short of the PRP and Assessment recommendation of 6.0 acres per 1,000 residents.[40] While data regarding the level of use for the recreational sites and facilities that serve the Project Site are not available, such resources within the surrounding community are heavily utilized and often overburdened.[41]

The PRP identifies multiple park types based on size, type, intended users, and service radius size. Regional parks provide specialized recreation facilities and/or attractions (wilderness areas, campgrounds, lakes, golf courses, etc.), and have a service radius encompassing the entire Los Angeles region. Community parks are ideally 15 to 20 acres in size, provide park facilities servicing several neighborhoods (e.g., playfields, courts, swimming pools, etc.), and have a service radius of two miles. Neighborhood parks are ideally five to 10 acres in size, are intended to serve residents of all ages in its immediate neighborhood (playfields, turfed picnic areas, etc.), are pedestrian-accessible without crossing a major arterial street or highway/freeway, and have a service radius of one mile. Pocket parks and specialty parks are ideally one-half-acre in size, intended to service a school or immediate surroundings, and have a service radius of approximately one-half mile.[42]

(2) Existing Parks in the Project Area

The Project Site is currently developed, and no existing parks or recreational facilities are located on-site. Based on correspondence with RAP, seven neighborhood parks, five community parks, and three regional parks were identified within a two-mile radius of the Project Site. The nearest public park, Selma Park at 6567 Selma Avenue, is located approximately 0.35 miles southwest of the Project Site. Selma Park is a neighborhood park that includes a children's play area, benches, and outdoor tables.[43] The two next closest public parks/recreational facilities are Carlton Way Park and the Yucca Park/Yucca Community Center. Carlton Way Park at 5927 W. Carlton Way is located approximately 0.38 miles to the southeast of the Project Site. Carlton Way Park is a neighborhood park that includes a children's play area and outdoor fitness

[40] City of Los Angeles, Public Recreation Plan, approved October 9, 1980.
[41] Darryl Ford, Senior Management Analyst II, Planning, Maintenance, and Construction Branch, City of Los Angeles Department of Recreation and Parks (RAP), letter correspondence dated October 11, 2018. Provided in Appendix M-4 of this Draft EIR.
[42] City of Los Angeles, Public Recreation Plan, approved October 9, 1980.
[43] RAP, Selma Park, https://www.laparks.org/park/selma, accessed October 25, 2018.

equipment.[44] Yucca Park and the Yucca Community Center are co-located at 6671 Yucca Street and are approximately 0.38 miles west of the Project Site. Yucca Park/Yucca Community Center is a community park that includes basketball courts (lighted/outdoor), a children's play area, picnic tables, a soccer field (unlighted), benches, a synthetic field, and a computer lab.[45] The Yucca Community Center supports two sports programs, which include youth coed soccer and a girl's youth soccer league. Other programs at the Yucca Community Center include an after school club, ballet, a computer lab, piano class, summer/winter camps (including Camp Yucca), karate, soccer clinics, and the Tregnan Golf Academy.[46] RAP's website also identifies three additional parks located within two miles of the Project Site: (1) the Lake Hollywood Park[47], located at 3160 Canyon Lake Drive approximately 1.56 miles to the north of the Project Site; (2) Bronson Canyon[48], located at 3200 Canyon Drive approximately 1.58 miles to the northeast of the Project Site; and (3) Burns (Robert L.) Park[49], located at 4900 Beverly Boulevard approximately 1.95 miles to the southeast of the Project Site. Lake Hollywood Park contains a children's play area, picnic tables, and barbecue pits. Bronson Canyon contains picnic tables and a hiking trail. The Burns (Robert L.) Park contains a children's play area and picnic tables.

RAP has separate plans for the expansion of parks and recreational facilities within the Project vicinity, including the installation of new playground equipment at De Longpre Park and a new synthetic soccer field at Hollywood Recreation Center, and refurbishing of the basketball courts at Hollywood Recreation Center, Lemon Grove Recreation Center, and Yucca Community Center.[50]

Existing parks and recreational facilities described above and those that are located within two miles of the Project Site are listed in **Table IV.K.4-1**, *RAP Parks and Recreational Facilities Located Within Two Miles of the Project Site*, and are shown in **Figure IV.K.4-1**, *RAP Parks and Recreational Facilities Located Within Two Miles of the Project Site*. Several additional parks that are not under the jurisdiction of RAP, including Barnsdall Art Park, which is owned and operated by the City's Department of Cultural Affairs, are located in proximity to the Project Site.

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44 RAP, Carlton Way Park, https://www.laparks.org/park/carlton-way-park, accessed October 25, 2018.

45 RAP, Yucca Park, https://www.laparks.org/park/yucca, accessed October 25, 2018.

46 RAP, Yucca Community Center, https://www.laparks.org/reccenter/yucca-community, accessed October 25, 2018.

47 RAP, Lake Hollywood Park, https://www.laparks.org/park/lake-hollywood, accessed March 4, 2020.

48 RAP, Bronson Canyon, https://www.laparks.org/park/bronson-canyon, accessed March 4, 2020.

49 RAP, Burns (Robert L.) Park, https://www.laparks.org/park/burns, accessed March 4, 2020.

50 Darryl Ford, Senior Management Analyst II, Planning, Maintenance, and Construction Branch, City of Los Angeles Department of Recreation and Parks (RAP), letter correspondence dated October 11, 2018. Provided in Appendix M-4 of this Draft EIR.

TABLE IV.K.4-1
RAP PARKS AND RECREATIONAL FACILITIES LOCATED WITHIN TWO MILES OF THE PROJECT SITE

Name	Address	Park Type
Hollywood Recreation Center	1122 Cole Avenue	Community
Las Palmas Senior Citizen Center	1820 N. Las Palmas Avenue	Community
Lemon Grove Recreation Center	4959 Lemon Grove Avenue	Community
Poinsettia Recreation Center	7431 Willoughby Avenue	Community
Yucca Community Center	6671 W. Yucca Street	Community
Carlton Way Park	5927 W. Carlton Way	Neighborhood
De Longpre Park	1350 Cherokee Avenue	Neighborhood
Dorothy J. and Benjamin B. Smith Park	7020 Franklin Avenue	Neighborhood
La Mirada Avenue Park	5401 La Mirada	Neighborhood
Lexington Avenue Pocket Park	5523 Lexington Avenue	Neighborhood
Seily Rodriguez Park	5707 Lexington Avenue	Neighborhood
Selma Park	6567 Selma Avenue	Neighborhood
Burns (Robert L.) Park	4900 Beverly Boulevard	Neighborhood
Griffith Park	4730 Crystal Springs Drive	Regional
Runyon Canyon Park	2000 N. Fuller Avenue	Regional
Wattles Garden Park	1824 N. Curson Avenue	Regional
Lake Hollywood Park	3160 Canyon Lake Drive	Regional
Bronson Canyon	3200 Canyon Drive	Regional

SOURCE: Darryl Ford, Senior Management Analyst II, Planning, Maintenance, and Construction Branch, City of Los Angeles Department of Recreation and Parks, letter correspondence dated October 11, 2018. Provided in Appendix M-4 of this Draft EIR.

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to parks and recreation if it would:

Threshold (a): 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 parks;

SOURCE: Open Street Map, 2018; City of Los Angeles Department of Recreation and Parks, 2020; ESA, 2020

Hollywood Center Project

Figure IV.K.4-1
Parks and Recreational Facilities Located in the Vicinity of the Project Site

Threshold (b): 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; or

Threshold (c): Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

For this analysis, the Appendix G Thresholds listed above are relied upon. The analysis utilizes the factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions. The factors to evaluate parks and recreation impacts include:

- The net population increase resulting from the proposed project.
- The demand for recreation and park services anticipated at the time of project build-out compared to the expected level of service available. Consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand.
- Whether the project includes features that would reduce the demand for recreation and park services (e.g., on-site recreation facilities, land dedication or direct financial support to the Department of Recreation and Parks).

b) Methodology

The analysis of parks and recreation impacts is based on an estimate of the Project's residential population size (based on the number of units), which could potentially place additional demand and therefore impacts to park and recreational facilities. The commercial, retail, and potential hotel uses are not considered to generate additional demand to park and recreational facilities. It also considers the Project's proposed recreation and open space features and whether the provision of those facilities could reduce Project-generated demand.

As stated in LAMC Section 12.21 G, open space is defined as areas defined for active and passive recreation and may consist of private and common areas. Publicly accessible open space includes ground floor areas that could be accessed by the general public, as well as residents within the Project Site. Common open space areas must be readily accessible to all residents of the site (are not accessible by the general public). Common open space areas can incorporate recreational amenities such as swimming pools, spas, picnic tables, benches, children's play areas, ball courts, barbecue areas, and sitting areas. Outdoor common open space are outdoor areas within the buildings themselves that would be for the exclusive use of each building's residents and their guests.

Indoor common open space are those areas internal to the buildings themselves that would be for the exclusive use of each building's residents and their guests (i.e., residents and guests of residents at the East Site would only be able to use East Site indoor common open space; the same goes for residents and guests of residents at the East Site). Private open space is defined as an area which is contiguous to and immediately accessible from an individual dwelling unit, may have a dimension no less than six feet in any direction and must contain a minimum of 50 square feet.

The estimated new Project-generated population, as well as the Project-provided recreational facilities, are converted to a service ratio expressed as acres of parkland per 1,000 residents. The ratio is compared to existing service ratios within the Hollywood Community Plan area and the City as a whole, as well as service standards set forth by the City's Quimby Act provisions, the PRP, and the requirements set forth in LAMC.

The analysis of impacts to parks and recreational facilities identifies the potential demand that would be generated by the Project and the potential for that additional demand to result in the need for expansion of existing and/or new facilities. The analysis considers the extent to which Project-provided facilities would reduce potential impacts and identifies the residual impacts that could occur to existing facilities. The analysis also addresses potential impacts on park facilities that might occur due to temporary construction activities.

c) Project Design Features

No specific Project Design Features are proposed with regard to parks and recreation beyond the open space and recreational amenities described in Chapter II, *Project Description*, of this Draft EIR, and the additional details provided in the following impact analysis portion of this section.

d) Project Impacts

Threshold (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 parks?

The Project and the Project with the East Site Hotel Option would have similar open space and recreational features although there would be differences in quantities provided. Thus, to demonstrate whether the Project or the Project with the East Site Hotel Option complies with the City's requirement for open space,

separate calculations and impact analyses are provided for the Project and the Project with the East Site Hotel Option. However, conclusions regarding the impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

(1) Impact Analysis

(a) Public Recreation Plan

(i) Project

As discussed in Section IV.J, *Population and Housing*, of this Draft EIR, the Project's 1,005 multi-family residential housing units would generate an estimated 2,433 residents.[51] Based on this residential population, the Project would be required to provide approximately 2.43 acres each of neighborhood and community recreational sites and facilities, for a total of 4.87 acres, to meet the PRP's recommendations of 2.0 acres per 1,000 persons.[52] As previously discussed, the PRP recommends 2.0 acres each of neighborhood and community recreational sites and facilities per 1,000 persons, and 6.0 acres of regional recreational sites and facilities per 1,000 residents.

The Project would provide approximately 166,582 square feet or 3.82 acres of common open space accessible by all Project residents and visitors. This would fall approximately 1.07 acres short of the 4.87 acres of neighborhood and community recreational sites and facilities recommended in the amended PRP, based on the Project's projected residential population. However, as previously discussed, the PRP parkland guidelines are Citywide goals and do not constitute requirements for individual development projects.

As the Capitol Records Lot Scenario would not affect the number of residential units as compared to the Project, there would be no changes under the Capitol Records Lot Scenario as under what is analyzed in this subsection.

As noted above, given the Project's open space and recreational amenities, including common space areas, pools, outdoor seating and lounging, fitness areas, locker rooms, children's rooms, game rooms, private libraries, and multi-purpose rooms, it is expected that the Project-related recreational demand would be at least partially accommodated on the Project Site. Likewise, it can be reasonably assumed that residual off-site park usage would likely be dispersed among the seven neighborhood parks, five community parks, and three regional parks that RAP has indicated would serve the Project Site. Notwithstanding the

[51] Average household size is based on 2017 Census American Community Survey 5-Year Estimate data (2013–2017), www.census.gov/programs-surveys/acs/technical-documentation/table-and-geography-changes/2015/5-year.html, per correspondence with Jack Tsao, Housing Planner, Los Angeles Department of City Planning, July 31, 2019.

[52] 2,433 residents/1,000 persons = 2.43 X 1 acre = 2.43 acres X 2 = 4.87 acres

on-site open space and recreational amenities proposed and the private and planned public amenities in the Project vicinity, some Project residents would still be expected to utilize nearby public park amenities, such as picnic areas, sports fields, and basketball courts.

However, compliance with regulatory requirements would ensure that the intent of the PRP's parkland guidelines would be addressed through compliance with state law (e.g., Quimby Act) as enforced through applicable LAMC requirements related to the provision and/or funding of parks and recreational spaces (e.g., provision of on-site recreational amenities and open space and payment of the Dwelling Unit Construction Tax and Quimby fees, where applicable).

(ii) Project with the East Site Hotel Option

The Project with the East Site Hotel Option would result in 884 multi-family residential housing units that would generate an estimated 2,140 residents. Based on this residential population, the Project would be required to provide approximately 2.14 acres each of neighborhood and community recreational sites and facilities, for a total of 4.28 acres, to meet the PRP's recommendations of 2.0 acres per 1,000 persons.[53,54] The Project with the East Site Hotel Option would provide approximately 150,371 square feet or 3.45 acres of common open space accessible by all Project residents and visitors. This would fall approximately 0.85 acre short of the 4.30 acres of neighborhood and community recreational sites and facilities recommended in the amended PRP, based on the Project with the East Site Hotel Option's projected residential population. However, as previously discussed, the PRP parkland guidelines are Citywide goals and do not constitute requirements for individual development projects.

For the same reasons as presented above, compliance with regulatory requirements would ensure that the intent of the PRP's parkland guidelines would be addressed through compliance with state law (e.g., Quimby Act) as enforced through applicable LAMC requirements related to the provision and/or funding of parks and recreational spaces (e.g., provision of on-site recreational amenities and open space and payment of the Dwelling Unit Construction Tax and Quimby fees, where applicable).

(b) Los Angeles Municipal Code

(i) Project

The Project would be subject to LAMC requirements that are intended to reduce the increased demands for parks and recreational facilities that are created by

53 2,140 residents/1,000 persons = 2.14 X 1 acres = 2.14 acres X 2 = 4.28 acres

54 Average household size is based on 2017 Census American Community Survey 5-Year Estimate data (2013–2017), www.census.gov/programs-surveys/acs/technical-documentation/table-and-geography-changes/2015/5-year.html, per correspondence with Jack Tsao, Housing Planner, Los Angeles Department of City Planning, July 31, 2019.

residential development projects. As previously discussed, LAMC Section 12.33 sets park and recreational facility dedication and/or in lieu fee requirements for new residential subdivisions based on the maximum residential density at which a site may or will be developed. LAMC Section 12.33 H permits privately-held open space and recreational facilities developed within a project site to be credited against the project's park dedication and/or in lieu fee requirement, as long as these facilities are available for use by all project residents and reduce that project's need for public recreation and park facilities. On April 5, 2017, the RAP Board of Commissioners approved payment of in-lieu fees for the Project via a recommendation to the Advisory Agency.[55]

The Project would include development of 1,005 residential units on the 4.46-acre Project Site, resulting in a residential density of approximately 225.3 units per acre. Based on the formula provided within LAMC Section 12.33 D, up to approximately 6.10 acres[56] of the Project Site would be required to be dedicated to the City, or equivalent in-lieu fees paid, for parkland and recreational facilities. The Project does not propose the dedication of any portion of the Project Site to the City for parks and recreational facilities.

As indicated in **Table IV.K.4-2**, *Project Open Space Requirements*, the Project would include the development of 1,005 residential units, for which LAMC Section 12.21 G would require the provision of 120,175 square feet of usable open space on the Project Site. Per LAMC Section 12.21 G, at least 50 percent (i.e., 60,087.50 square feet) of open space must be common open space, with at least 25 percent of this common open space (i.e., 15,021.88 square feet) planted with ground cover, shrubs, or trees.

Table IV.K.4-3, *Project Open Space*, provides a detail of the total amount open space for each of the four types that would be provided across the Project Site. As shown in the table, the Project would exceed the total amount of open space that is required on both the West Site and the East Site and, therefore, exceed requirements for the Project as a whole (by 46,407 square feet).

As presented in Table IV.K.4-3, the Project would include approximately 89,060 square feet (2.04 acres) of open space that would be common space for the use of Project residents, employees, and the general public. The Project would also provide 43,600 square feet of private open space in the form of private balconies, for a total of 166,582 square feet (3.82 acres) of open space across the Project Site.

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55 City of Los Angeles Board of Recreation and Park Commissioners, Board Report, Vesting Tentative Tract Map (VTT) Np. 74765 – Recommendation to the Advisory Agency for Land Dedication of In-Lieu Park Fee Payment, April 5, 2017. Provided in Appendix M-4, Public Service Provider Correspondence – Los Angeles Department of Recreation and Parks, of this Draft EIR.

56 Land to be dedicated in acres (LD): (1,005 x 2.42) x 0.00251 = 6.10 acres for the Project

TABLE IV.K.4-2
PROJECT OPEN SPACE REQUIREMENTS

Proposed Residential Units	Quantity (units)	Factor (sf/unit)[a]	Open Space Requirement
1BR Apartments	482	100	48,200 sf
2BR Apartments	391	125	48,875 sf
3BR Apartments	132	175	23,100 sf
Total	**1,005**	**--**	**120,175 sf (2.76 ac)**

[a] Factors from LAMC Section 12.21 G.

SOURCE: ESA, 2019.

TABLE IV.K.4-3
PROJECT OPEN SPACE

	West Site	East Site	Total (Across Project Site)
Publicly Accessible Open Space	8,932 sf	24,990 sf	33,922 sf
Outdoor Common Open Space	33,124 sf	19,978 sf	53,102 sf
Indoor Common Open Space	22,246 sf	13,712 sf	35,958 sf
Private Open Space (Balconies)	22,450 sf	21,150 sf	43,600 sf
Total Open Space Provided	**86,752 sf**	**79,830 sf**	**166,582 sf**
Total Open Space Required	***61,075 sf***	***59,100 sf***	***120,175 sf***
Open Space Surplus	***25,677 sf***	***20,730 sf***	***46,407 sf***

SOURCE: ESA, 2019.

(ii) Project with the East Site Hotel Option

Based on the same formula provided within LAMC Section 12.33 D, the Project with the East Site Hotel Option would be required to dedicate 5.37 acres, or equivalent in-lieu fees paid, for parkland and recreational facilities.[57] The Project with the East Site Hotel Option would replace 104 residential units with 220 hotel rooms. As indicated in **Table IV.K.4-4**, *Project with the East Site Hotel Option*

[57] LD: (884 x 2.42) x 0.00251 = 5.37 acres for the Project with the East Site Hotel Option

Open Space Requirements, the Project with the East Site Hotel Option would include the development of 884 residential units, for which LAMC Section 12.21 G would require the provision of 106,525 square feet of usable open space on the Project Site. As stated above, the commercial, retail, and potential hotel uses are not considered to generate additional demand to park and recreational facilities and do not require the provision of open space.

TABLE IV.K.4-4
PROJECT WITH THE EAST SITE HOTEL OPTION OPEN SPACE REQUIREMENTS

Proposed Residential Units	Quantity (units)	Factor (sf/unit)[a]	Open Space Requirement
1BR Apartments	411	100	41,100 sf
2BR Apartments	347	125	43,375 sf
3BR Apartments	126	175	22,050 sf
Total	**884**	**--**	**106,525 sf (2.45 ac)**

[a] Factors from LAMC Section 12.21 G.

SOURCE: ESA, 2019.

As described above, per LAMC Section 12.21 G, at least 50 percent (i.e., 53,262.50 square feet) of this open space must be common open space, with at least 25 percent of this common open space (i.e., 26,631.25 square feet) planted with ground cover, shrubs, or trees.

Given the reduction in residential units, implementation of the Project with the East Site Hotel Option would require the provision of less open space across the Project Site than the Project. Under the Project with the East Site Hotel Option, proposed open space would total approximately 150,371 square feet or 3.45 acres. The West Site would continue to provide a total of 86,752 square feet of open space as under the Project. Given the reduction in residential units, the East Site would provide a total of 63,619 square feet of open space.

Table IV.K.4-5, *Project with the East Site Hotel Option Open Space*, presents the total amount of open space that would be provided across the Project Site under the Project with the East Site Hotel Option. As shown in the table, the Project with the East Site Hotel Option would exceed the total amount of open space that is required on both the West Site and the East Site and, therefore, exceed requirements for the Project with the East Site Hotel Option as a whole (by 43,846 square feet).

TABLE IV.K.4-5
PROJECT WITH THE EAST SITE HOTEL OPTION OPEN SPACE

	West Site	Project with the East Site Hotel Option	Total (Across Project Site)
Publicly Accessible Open Space	8,932 sf	24,990 sf	33,922 sf
Outdoor Common Open Space	33,124 sf	14,347 sf	47,471 sf
Indoor Common Open Space	22,246 sf	8,332 sf	30,578 sf
Private Balconies	22,450 sf	15,950 sf	38,400 sf
Total Open Space Provided	**86,752 sf**	**63,619 sf**	**150,371 sf**
Total Open Space Required	**61,075 sf**	**45,450 sf**	**106,525 sf**
Open Space Surplus	**25,677 sf**	**18,169 sf**	**43,846 sf**

SOURCE: ESA, 2019.

(iii) Capitol Records Lot Scenario

Pursuant to a lease between the Applicant and Capitol Records, Capitol Records must consent to certain proposed improvements that may impact Capitol Records' use of the property. Specifically, Capitol Records must grant its consent to portions of the proposed open space area on the East Site. Depending upon negotiations on use of the space, the East Site's open space area may be reduced and would be redesigned to accommodate Capitol Records and/or to comply with the lease. This scenario is defined and referred to herein as the Capitol Records Lot Scenario. As shown in **Figure II-27**, *Comparison of East Site Capitol Records Lot Scenario*, in Chapter II, *Project Description*, of the Draft EIR, the ground floor restaurant/retail space in the mezzanine floor along Argyle Avenue would be reduced by 1,800 square feet (i.e. from 7,580 square feet to 5,780 square feet) in order to maintain a minimum of 20-feet pedestrian circulation width through the paseo in the East Site near the Capitol Records lot. Under this scenario, the publicly accessible open space on the East Site ground level would be reduced from 24,990 square feet to 23,373 square feet (a reduction of 1,617 square feet). Additionally, common open space on the Level 2 Amenity Deck would be reduced from 14,875 square feet to 13,835 square feet (a reduction of 1,040 square feet). In total, open space would be reduced by 2,657 square feet. These changes would be the same across both the Project and the Project with the East Site Hotel Option. However, under this scenario, the open space area would still comply with the City's zoning requirements, including, but not limited to, the open space requirements, since the Project and the Project with the East Site Hotel Option both include more than enough open space to meet the zoning requirements even with the potential reduction for the Capitol Records Lot Scenario.

As the Capitol Records Lot Scenario would not affect the number of residential units, either under the Project or the Project with the East Site Hotel Option, there would be no changes to the parkland requirements under the Capitol Records Lot Scenario. The Capitol Records Lot Scenario would have the same requirements as the Project or the Project with the East Site Hotel Option, and therefore, would provide open space that would exceed the total amount of open space that is required.

(iv) Conclusion

The Project and the Project with the East Site Hotel Option do not propose the dedication of any portion of the Project Site to the City for parks and recreational facilities.

LAMC Section 21.10.3 sets a per-capita construction tax of $200 per new eligible residential unit for City acquisition of new park space, with the set-aside or dedication of parkland and recreational facilities and/or payment of in-lieu fees under LAMC Section 12.33 H credited against the payment of this tax. As the Applicant would pay the $200 tax per new eligible residential unit, per LAMC Section 12.33 G, the Project, as well as the Project with the East Site Hotel Option, would be consistent with LAMC Section 21.10.3 Dwelling Unit Construction Tax Requirements. Under the Capitol Records Lot Scenario, the Applicant would still be required to pay the $200 tax per new eligible residential unit.

Based on the above, with the proposed on-site open space and recreational facilities, in addition to the required payment of in-lieu fees, the Project and the Project with the East Site Hotel Option (without and with the Capitol Records Lot Scenario) would be consistent with LAMC open space and parkland requirements. Implementation of regulatory requirements would ensure that the parkland standards would be addressed through compliance with applicable LAMC requirements. **Therefore, the Project or the Project with the East Site Hotel Option would not 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. Impacts would be less than significant.**

(2) Mitigation Measures

Impacts regarding parks were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding parks were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (b): 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?

Construction activities would be essentially the same under the Project and the Project with the East Site Hotel Option. Accordingly, Project-related construction impacts under Threshold (b) would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the construction impact analysis presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

As analyzed in Section IV.J, *Population and Housing*, the Project would result in an estimated total population of 2,433 persons, while Project with the East Site Hotel Option would result in an estimated total population of 2,140 persons. Therefore, the Project's higher population is analyzed herein to provide a conservative analysis of impacts. However, conclusions regarding the impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

(1) Impact Analysis

(a) Construction Impacts

The nearest public park to the Project Site is Selma Park at 6567 Selma Avenue, located approximately 0.35 miles southwest of the Project Site. This park is not located along a major street that would provide access to the Project Site during construction. The distance of this park from the construction activity and the intervening development would avoid potential noise or conflict with construction activities. A small number of construction workers may visit the park during or after a workday. However, construction workers are temporary employees with high turnover associated with the various phases of construction, so such park use would be rare and short-term. **Therefore, the Project or the Project with the East Site Hotel Option construction would not result in increased use of existing neighborhood and regional parks or other recreational facilities such that substantial deterioration would occur or be fully accelerated. Construction of the Project and the Project with the East Site Hotel Option does not include or require the construction, alteration or expansion of recreational facilities that might have an adverse physical effect on the environment.**

(b) Operational Impacts

This analysis evaluates the Project's proposed provision of open space, demand for parks and recreational amenities associated with new residents.

The Project would provide up to 1,005 residential units with a residential population up to approximately 2,433 new residents. The Project would provide approximately 166,582 square feet or 3.82 acres of open space accessible by all Project residents and visitors. The Project with the East Site Hotel Option's 883 residential units are estimated to generate approximately 2,140 new residents. The Project with the East Site Hotel Option would provide approximately 150,371 square feet or 3.45 acres of open space accessible by all residents and visitors.

While the Project would result in an increase in the use of area public parks and recreational facilities, it is expected that Project resident use would be distributed across a number of the available recreational sites and facilities depending on the different amenities offered at each location, such that the impacts on any single location are likely to be relatively minor. Moreover, through the payment of required in-lieu fees for parks and recreational facilities, the Project would be consistent with the LAMC Section 12.33 parkland requirements. Therefore, demand would not cause substantial degradation of existing facilities or require a new public park.

The Project would also be subject to, and would comply with, LAMC regulations that require the dedication of parkland or payment of in-lieu fees that would supplement on-site recreational facilities in compliance with the LAMC. Further, in terms of whether the Project would result in physical impacts, it is anticipated that most Project residents, as well as Project employees, would use on-site recreational amenities (e.g., pool decks, fitness areas, and residential decks) and open space (e.g., plazas, the paseo, terraces, patios, landscaped areas, etc.) more frequently than off-site public parks and recreational facilities due to convenience. In this way, the Project's provision of on-site recreational amenities and open space would reduce the use of area parks and recreational facilities by Project residents. Nonetheless, some Project residents would still be expected to patronize other private or public parks and recreational facilities, including nearby public park amenities, such as picnic areas, tennis courts, basketball courts, and sports fields.

Therefore, the Project or the Project with the East Site Hotel Option would not 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. Impacts would be less than significant.

(2) Mitigation Measures

Impacts regarding parks and recreation were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding parks and recreation were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (c): Would the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The Project and the Project with the East Site Hotel Option would both include similar on-site open space and recreational facilities. Accordingly, Project impacts under Threshold (c) would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

(1) Impact Analysis

As discussed above under Thresholds (a) and (b), the Project and the Project with the East Site Hotel Option would comply with regulations regarding open space and recreational facilities. Additionally, although the Project and the Project with the East Site Hotel Option would both increase the residential population on-site that would generate a demand for parks and recreational facilities, residents, guests, and employees would be anticipated to utilize the on-site open space and recreational facilities to a greater extent than off-site facilities. Furthermore, payment of Quimby Fees and compliance with LAMC Sections 12.33 and 21.10.3 would reduce impacts on parks and recreation facilities to a less-than-significant level. Therefore, while the Project would increase the use of existing neighborhood and regional parks or other recreational facilities, the Project's provisions of a variety of open space and amenities would not result in the substantial physical deterioration of existing park and recreation facilities. **As the Project or the Project with the East Site Hotel Option would provide their own open space and amenities, the Project or the Project with the East Site Hotel Option would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.**

(2) Mitigation Measures

Impacts regarding parks and recreation were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding parks and recreation were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

As analyzed in Section IV.J, *Population and Housing*, the Project would result in an estimated total population of 2,433 persons, while the Project with the East Site Hotel Option would result in an estimated total population of 2,140 persons. Therefore, the Project's higher population is analyzed herein to provide a conservative analysis of cumulative impacts. However, conclusions regarding the cumulative impact analysis and impact significance for the Project presented below are the same and also apply to the Project and the Project with the East Site Hotel Option.

(1) Impact Analysis

Chapter III, *Environmental Setting*, of this Draft EIR, identifies 150 related projects that are anticipated to be developed in the Project vicinity. The RAP bases its evaluations of park space on the availability of park services for residents as opposed to employees or visitors to an area. Most park visits originate from people's homes and residents tend to prefer using local parks out of convenience. Typically, employees are engaged in their work during the day and do not contribute notable demand for parks. If they use the parks, such usage would occur during the week rather the weekend. Given the RAP methodology for evaluating park services, this cumulative analysis on parks and recreation focuses on the related projects that propose residential uses.

These related projects, in conjunction with the Project, would cumulatively generate the need for additional parks and recreational facilities. Similar to the Project, the residential population of related projects within the City of Los Angeles was determined by multiplying the number of residential units by the average household size in the City of Los Angeles based on the 2017 Census American Community Survey 5-Year Estimate data.[58] The residential population of related projects within the City of West Hollywood was determined by multiplying the number of residential units by the average household size determined by the Southern California Association of Governments City of West Hollywood Local Profile.[59] More detailed information and calculations regarding the Project's population are provided in Section IV.J, *Population and Housing*, of this Draft EIR. As illustrated in **Table IV.K.4-6**, *Cumulative Impacts to Parks and Recreational Facilities*, the Project and related projects would result in an

[58] The average household size in the City of Los Angeles is based on 2017 Census American Community Survey 5-Year Estimate data (2013–2017), www.census.gov/programs-surveys/acs/technical-documentation/table-and-geography-changes/2015/5-year.html, per correspondence with Jack Tsao, Housing Planner, Los Angeles Department of City Planning, July 31, 2019.

[59] The average household size of 1.6 people in the City of West Hollywood is based on Southern California Association of Governments, Profile of the City of West Hollywood, Local Profiles Report 2019, May 2019.

estimated cumulative population growth of up to 40,641 residents.[60] This estimated total cumulative population is representative of the City of Los Angeles and the City of West Hollywood. This cumulative analysis is conservative because it assumes that all residents would be using City of Los Angeles resources; it is likely that impacts on local RAP parks would be residual after the use of on-site recreational amenities and open space and any other nearby parks.

TABLE IV.K.4-6
CUMULATIVE IMPACTS TO PARKS AND RECREATIONAL FACILITIES

	Housing Units	Population
Related Projects	16,092	38,208
Proposed Project	1,005	2,433
Total Cumulative	**17,097**	**40,641**

SOURCE: ESA, 2020.

The related projects represent a large number of large-scale projects that typically include adequate recreational amenities to meet market demand among condominium purchasers and renters. As these are large-scale projects, the applicable related projects would be required to provide on-site open space, which would include accessible open space and common open space for each respective project's residents. Similar to the Project, the respective projects' residents would likely be inclined to use facilities located on-site, reducing the impact on off-site parks and recreational facilities. The amended PRP reflects the City's recognition of the need to update and modernize the original PRP characterizations of open space and amenities that are integrated into new developments, including plazas, space for farmer's markets, community gardens, and other nontraditional amenities.

As is the case with the Project, impacts on local parks from related projects would be reduced by the provision of on-site open space and recreational amenities. In acknowledgement of this, as previously discussed, LAMC Section 12.33 H, Credits, allows private recreational areas developed within a project site for use by the project's residents to be credited as meeting up to 35 percent of the land dedication and/or in lieu fee requirement. The applicable related projects would also be required to pay in-lieu fees pursuant to LAMC Section 17.12, which is the City's parkland dedication ordinance that ensures compliance with the Quimby Act. Moreover, the use of off-site parks by related project residents can

[60] The cumulative total was calculated using the number of Project-generated residents, as this scenario would generate more residents than the Project with the East Site Hotel Option, providing a more conservative analysis.

reasonably be expected to be distributed across the parks serving the Project and related projects.

The recommendations set forth in the PRP are Citywide in scope and are not intended to be requirements for individual development projects. The Project would introduce a new residential population to the Community Plan Area, which would increase demand for and use of existing recreational sites and facilities. However, all related projects with residential uses would be required to comply with LAMC Sections 12.21 and 12.33, which require the provision of on-site open space and park facilities and/or payment of in-lieu fees to offset a project's impact to off-site park and recreational facilities. Should any residential developments not incorporate park and recreation facilities pursuant to LAMC Sections 12.21 and 12.33, they would be required to pay an in-lieu fee to the "Park and Recreational Sites and Facilities Fund" for the acquisition and development of park and recreational sites and facilities, pursuant to LAMC Section 21.10.3. Payment of the fees by each respective related project, as applicable, would ensure that such substantial physical deterioration would not occur or be accelerated and that all facilities would be maintained.

Therefore, with payment of the applicable fees, the Project and related projects would not 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; or include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment; or result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks. **Based on the above considerations, the Project's or the Project with the East Site Hotel Option's contribution to cumulative impacts would not be cumulatively considerable. As such, cumulative impacts on parks and recreational facilities would be less than significant.**

(2) Mitigation Measures

Cumulative impacts regarding parks were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Cumulative impacts regarding parks were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

IV. Environmental Impact Analysis

K.5 Libraries

1. Introduction

This section describes existing library facilities and services in the Project area and analyzes potential impacts on these facilities and services that could occur as a result of the Project. The analysis addresses available library capacity and ability to accommodate Project-related population growth. The analysis is based, in part, on library standards and capacity data and information provided by the City of Los Angeles Public Library (LAPL) and provided in Appendix M-5 of this Draft EIR.[1]

2. Environmental Setting

a) Regulatory Framework

(1) City of Los Angeles General Plan Framework Element

The City's General Plan Framework Element (Framework Element), adopted in December 1996 and readopted in August 2001, provides general guidance regarding land use issues for the entire City and defines Citywide policies regarding land use, including infrastructure and public services. Direction regarding the provision of adequate library services and facilities to meet the needs of the City's residents are set forth in Objectives 9.20 and 9.21. Objective 9.20 proposes to adopt a Citywide library service standard by the year 2000. Objective 9.21 proposes to ensure library services for current and future residents and businesses. The implementation plans and policies set forth in the Framework Element were addressed through the LAPL Branch Facilities Plan, which was first adopted in 1988 and later revised and approved by the Board of Library Commissioners on February 8, 2007, and funding initiatives (e.g., Measure L in 2011).

1 Los Angeles Public Library (LAPL), Business Office, correspondence dated December 13, 2018. Provided in Appendix M-5 of this Draft EIR.

(2) Hollywood Community Plan

The Land Use Element of the City's General Plan is comprised of 35 Community Plans. The City's Community Plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use at the community level. The Community Plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The City's Community Plans implement the City's General Plan Framework Element at the local level. The City's Community Plans express the goals, objectives, policies, and programs to address growth within each of the individual communities and depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities. The Project is located within the Hollywood Community Plan area.

The Hollywood Community Plan was adopted in 1988 and addresses growth and the arrangement of land uses within its boundaries through the year 2010.[2] The 1988 Hollywood Community Plan includes three policies that pertain to library services:

> **Policy 1:** That library facilities, procedures, programs and resources be continually evaluated and tailored to the social, economic and cultural needs of local residents.
>
> **Policy 2:** That, where feasible, bookmobile service to isolated residents be encouraged as a complimentary service of community branch libraries.
>
> **Policy 3:** That the expansion of existing library facilities and the acquisition of new sites be planned and designed to minimize displacement of housing and relocation of residents.[3]

The 1988 Hollywood Community Plan is the applicable adopted plan for the Project Site and is evaluated in this Draft EIR.

(3) Los Angeles Public Library Branch Facilities Plan

The LAPL Branch Facilities Plan (Facilities Plan), which was first adopted in 1988 and later revised in 2007 in the LAPL 2007-2010 Strategic Plan, includes building size standards for new libraries based on the size of the population served.[4] The Facilities Plan provides guidance on the design and construction of proposed libraries, as well as standards created as part of the Operational Initiatives to increase LAPL's operational efficiency and effectiveness. These standards outline the required facilities expansion needs of the libraries within the City based on the

2 City of Los Angeles Department of City Planning, Hollywood Community Plan, adopted December 13, 1988, p. HO-2.

3 City of Los Angeles Department of City Planning, Hollywood Community Plan, adopted December 13, 1988.

4 LAPL, Building on Success: Strategic Plan, 2007–2010.

location and population served in each community. They were developed based on research conducted by the City concerning the library system's most significant needs and the future development of branch libraries, library use statistics, feedback concerning experiences at branch libraries, and public feedback received at more than 300 community meetings held during Facilities Plan development.[5] The Facilities Plan criteria for new libraries is shown in **Table IV.K.5-1**, *LAPL Branch Facilities Plan – New Library Building Size Standards*.

TABLE IV.K.5-1
LAPL BRANCH FACILITIES PLAN – NEW LIBRARY BUILDING SIZE STANDARDS

Population Served	Size of Facility[a]
Above 45,000	12,500 sf
Below 45,000	14,500 sf
Regional Branch	Up to 20,000 sf

[a] For communities with populations above 90,000, the LAPL suggest consideration of adding a second branch to that area.

SOURCE: LAPL, Building on Success: Strategic Plan, 2007–2010.

The 1988 Facilities Plan has been implemented with two bond measures: the 1989 Bond Program and the 1998 Bond Program.[6] In 1989, City voters approved Phase I of the Branch Facilities Plan through the 1989 Bond Program, which provided $53.4 million for 26 library projects. Under Phase I, the 1988 Facilities Plan proposed to obtain new sites for building, renovating, and expanding libraries that were unable to serve the community sufficiently and/or were damaged by the Whittier earthquake. The LAPL also obtained additional funds from the Community Development Block Grant Award of federal funds from the California State Library Proposition 85, as well as from Friends of the Library groups, for a total branch construction program of $108 million. Under the 1989 Bond Program, 29 libraries were built.[7]

On November 3, 1998, Los Angeles voters approved Proposition DD, also known as the 1998 Library Facilities Bond. The 1998 Library Facilities Bond, which was Phase II of the 1988 Facilities Plan, authorized $178.3 million in bonds for funding the construction, renovation, improvement, or expansion of 32 new branch libraries. As a result of effective project management, four additional projects were added to the scope of the overall facilities program. Of the 36 total projects, 18 existing library facilities were replaced with 18 new library facilities on the

5 LAPL, Building on Success: Strategic Plan, 2007 – 2010, p. VI-2.
6 LAPL, Building on Success: Strategic Plan, 2007 – 2010, p. VI-1.
7 LAPL, Building on Success: Strategic Plan, 2007 – 2010, p. VI-1.

existing City-owned sites, nine libraries were constructed on newly acquired sites, five new libraries were constructed on acquired sites in communities that previously did not have library services, and four existing libraries were renovated and expanded. The entire original 1988 Facilities Plan was completed in 2005.[8]

With the completion of the projects identified in the 1988 Facilities Plan, the LAPL began planning for future library services and facilities needs for population growth projections to the year 2030. A revised 2007 Branch Facilities Plan was reviewed and approved by the Board of Library Commissioners on February 8, 2007, as the new strategic plan for future LAPL developments.[9]

(4) Los Angeles Public Library Strategic Plan 2015–2020

The LAPL Strategic Plan 2015–2020 (Strategic Plan) sets forth LAPL's goals and objectives regarding library services.[10] The goals and objectives discussed in the Strategic Plan focus on community development and program expansion in an effort to increase the number of people who use the library services, increase the number of library card holders, and increase residents' overall engagement with the library. The Strategic Plan does not include goals or objectives regarding LAPL's construction of new facilities or expansion of existing facilities. Such goals and objectives are contained in the Branch Facilities Plan, which continues to guide the construction, maintenance, and organization of LAPL's library facilities.

b) Existing Conditions

The LAPL system provides library services to the City through its Central Library, eight regional branches, and 64 community branches, with a multimedia inventory of over 7 million items and 2,600 computer workstations with access to the internet and electronic databases.[11] All branch libraries provide free access to computer workstations that are connected to the LAPL's information network. In addition to providing internet access, these workstations enable the public to search the LAPL's electronic resources including the online catalog, over 100 online databases, word processing, language learning, literacy, and a large collection of historic documents and photographs. In addition, the LAPL provides specially designed websites for children, teens, and Spanish-speaking patrons.

LAPL is a member of the Southern California Library Cooperative (SCLC). SCLC is an association of 39 independent cities, county, and special district public libraries located in Los Angeles and Ventura Counties that shares resources to

8 LAPL, Building on Success: Strategic Plan, 2007 – 2010, p. 4.
9 LAPL, Building on Success: Strategic Plan, 2007 – 2010, p. VI-4.
10 LAPL, Los Angeles Public Library Strategic Plan 2015-2020.
11 LAPL, About the Library, Los Angeles Public Library By The Numbers (FY) 2017-2018.

improve library service to the residents of all participating jurisdictions. Participation in this program enables mutual loan privileges and allows member libraries to receive compensation for such use.[12]

The LAPL derives its library service populations from Map LA as part of the Los Angeles Times.[13] The LAPL service populations are based on the number of people residing in census tracts that are assigned to (i.e., served by) a specific library.[14] The LAPL has identified three LAPL branch libraries that would serve the Project: the Goldwyn Hollywood Regional Branch Library, John C. Fremont Branch Library, and the Will and Ariel Durant Branch Library.[15]

Figure IV.K.5-1 and **Table IV.K.5-2**, *Libraries Located in the Vicinity of the Project Site,* identify the location of these libraries in relation to the Project Site. Table IV.K.5-2, provides information regarding these libraries, including their distance/direction from the Project Site, size, collection size/circulation, staffing level, and service population.

(1) Goldwyn Hollywood Regional Branch Library

The Goldwyn Hollywood Regional Branch Library is located approximately 0.16 miles southwest of the Project Site, at 1623 North Ivar Avenue. According to the LAPL, this 19,000-square-foot branch serves a population of 54,840 persons. The Goldwyn Hollywood Regional Branch Library currently has 14.5 full-time staff positions and five volunteers. The Goldwyn Hollywood Regional Branch Library includes a total of 86,920 volumes and has an annual circulation of 104,076. As a result of a fire in 1982 and subsequent support from the Goldwyn Foundation, the Special Collections Room was established in 1985 to protect, preserve, and make available for research a collection of scarce, rare, and unique materials reflecting the community's interest in the performing arts and the history of the Hollywood area. Special facilities available for public use include free public wireless internet, wireless printing, computer reservations, meeting room rentals, and zoom text computers for the visually impaired.[16]

12 Southern California Library Cooperative Website, http://www.socallibraries.org/, accessed January 23, 2019.
13 LAPL, Business Office, correspondence dated December 13, 2018. Provided in Appendix M-5 of this Draft EIR.
14 LAPL, Business Office, correspondence dated December 13, 2018. Provided in Appendix M-5 of this Draft EIR.
15 LAPL, Business Office, correspondence dated December 13, 2018. Provided in Appendix M-5 of this Draft EIR.
16 LAPL, Business Office, correspondence dated December 13, 2018. Provided in Appendix M-5 of this Draft EIR.

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SOURCE: Open Street Map 2017

Hollywood Center Project

Figure IV.K.5-1
Libraries Located in the Vicinity of the Project Site

TABLE IV.K.5-2
LIBRARY FACILITIES LOCATED IN THE VICINITY OF THE PROJECT SITE

Library	Hours of Operation	Distance/ Direction from Project Site [a]	Size in Square Feet (sf)	Collection Size/ Circulation	Full-Time Staff/ Volunteers	Service Population
Goldwyn Hollywood Regional Branch Library 1623 North Ivar Avenue Los Angeles, CA 90028	Monday through Thursday: 10am–8pm Friday and Saturday: 9:30am–5:30pm Sunday: 1pm–5pm	0.16 miles Southwest	19,000	86,920/ 104,706	14.5/5	54,840
John C. Fremont Branch Library 6121 Melrose Avenue Los Angeles, CA 90038	Monday and Wednesday: 10am–8pm Tuesday and Thursday: 12pm–8pm Friday and Saturday: 9:30pm–5:30pm Sunday: Closed	1.34 miles Southwest	7,361	40,452/ 57,866	8.5/14	18,418
Will and Ariel Durant Branch Library 7140 West Sunset Boulevard Los Angeles, CA 90046	Monday and Wednesday: 10pm–8pm Tuesday and Thursday: 12pm–8pm Friday and Saturday: 9:30am–5:30pm Sunday: Closed	1.07 miles Southwest	12,500	47,727/ 242,634	10.5/34	92,851

[a] Approximate distance/direction from Project Site in miles is a straight line distance, not a drive distance.

SOURCE: LAPL, Business Office, correspondence dated December 13, 2018. Provided in Appendix M-5 of this Draft EIR.

(2) John C. Fremont Branch Library

The John C. Fremont Branch Library is a local branch library, located approximately 1.34 miles southwest of the Project Site, at 6121 Melrose Avenue. According to the LAPL, this 7,361-square-foot branch library serves a population of 18,418 persons. The John C. Fremont Branch Library currently has 8.5 full-time staff positions and 14 volunteers. The John C. Fremont Branch Library includes a total of 40,452 volumes and has an annual circulation of 57,866. Special facilities available for public use include free public wireless internet, wireless printing, computer reservations, and meeting room rentals.[17]

[17] LAPL, Business Office, correspondence dated December 13, 2018. Provided in Appendix M-5 of this Draft EIR.

(3) Will and Ariel Durant Branch Library

The Will and Ariel Durant Branch Library is a local branch library, located approximately 1.07 miles southwest of the Project Site, at 7140 West Sunset Boulevard. The Will and Ariel Durant Branch Library, which is a 12,500-square-foot branch library that serves a population of 92,851 persons. The Will and Ariel Durant Branch Library currently has 10.5 full-time staff positions and 34 volunteers. The Will and Ariel Durant Branch Library includes a total of 47,727 volumes and has an annual circulation of 242,634. Special facilities available for public use include free public wireless internet, wireless printing, computer reservations, and meeting room rentals.[18]

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to libraries if it would:

Threshold (a): 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 libraries.

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions. The factors to evaluate libraries impacts include:

The net population increase resulting from the proposed project;

The demand for library service anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to library services (renovation, expansion, addition or relocation) and the project's proportional contribution to the demand; and

Whether the project includes features that would reduce the demand for library services (e.g., on-site library facilities or direct support to LAPL).

[18] LAPL, Business Office, correspondence dated December 13, 2018. Provided in Appendix M-5 of this Draft EIR.

b) Methodology

The LAPL defines population-based service standards for service areas associated with each library location. Potential Project impacts on library facilities and services are therefore determined by identifying the primary service library or libraries that serve the Project Site, determining the population capacity within the associated library service area(s), and comparing the number of new Project-related residents to the capacity of the library to serve new residents. The number of Project residents was calculated by using the average household size of 2.42 persons per household based on 2017 Census American Community Survey five-year average estimate (2013-2017), as cited in Section IV.J, *Population and Housing*, of this Draft EIR.[19] Capacity to serve new residents is based on a comparison of the number of people residing within the library service area to the population standard for the size of the library.

No existing housing or other commercial uses, outside of the existing Capitol Records Complex, are located on the Project Site. The AMDA-leased building is used on a daily basis for film and television sets and props storage. While temporary visitors are generated by the AMDA building, the existing visitors would already be accounted for in the existing library service area and capacity. The existing visitors and employees associated with the Capitol Records Complex would not be affected by the Project. Therefore, the residents generated by the Project would represent a new demand for library services compared to existing conditions.

c) Project Design Features

No specific Project Design Features are proposed with regard to libraries.

d) Analysis of Project Impacts

Threshold (a): Would the Project result in a substantial adverse physical impact associated with the provision of new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for libraries?

Construction activities would be essentially the same under the Project and the Project with the East Site Hotel Option. Accordingly, Project-related construction impacts would be essentially the same under the Project and the Project with the

[19] Based on 2017 Census American Community Survey 5-Year Estimate data (2013–2017), www.census.gov/programs-surveys/acs/technical-documentation/table-and-geography-changes/2015/5-year.html, per correspondence with Jack Tsao, Housing Planner, Los Angeles Department of City Planning, July 31, 2019.

East Site Hotel Option. Thus, the conclusions regarding the construction impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

As analyzed in Section IV.J, *Population and Housing*, the Project would result in an estimated total population of 2,433 persons, while the East Site Hotel Option would result in an estimated total population of 2,140 persons. Therefore, the Project's higher population is analyzed herein to provide a conservative analysis of impacts. Also, a discussion of the hotel guests is provided for the Project with the East Site Hotel Option. Nonetheless, the conclusions regarding the library impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

(1) Impact Analysis

(a) Construction Impacts

The Project's construction workers would be drawn from an existing regional labor pool whose workers move between construction projects on a short-term basis without requiring relocation. Workers traveling to work may stop at a library that is outside of their residential neighborhood. Such library stops would be incidental and typical of workers throughout the region. Such variations would occur on short-term bases. Therefore, there would be no notable increase in library usage at the libraries serving the Project Site, and, therefore, there would be no need for the construction of library facilities to accommodate construction population.

The increase in demand for library services due to Project construction would be negligible in amount and duration and Project construction activities would not adversely affect local libraries. **As such, construction of the Project or the Project with the East Site Hotel Option 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, which would result in the need for new or altered facilities, or substantially increase the demand for library services for which current demand exceeds the ability of the facility to adequately serve the population. Impacts on library facilities during Project construction would be less than significant.**

(b) Operational Impacts

The Project would provide up to 1,005 housing units whose occupants would use local libraries in the Project Site area. The Project Site currently has no residential uses, and, therefore, the Project would result in an increase of up to approximately 2,433 new residents.

With regards to the potential for the employees of the proposed uses to utilize nearby library facilities, as discussed in Section IV.J, *Population and Housing*, the Project and the Project with the East Site Hotel Option would result in

approximately 206 and 445 employees, respectively. These new employee opportunities would include a range of full-time and part-time positions that would typically be filled by persons already residing in the vicinity of their workplace and who already generate demand for the libraries in the vicinity of the Project Site. As such, any direct or direct demand for library services generated by employees of the Project would be negligible.

Under the Project with the East Site Hotel Option, hotel guests may stop at a library serving the Project Site, however, such library stops would be incidental and such variations would occur on short-term bases. There would be no notable increase in library usage at the libraries serving the Project Site from hotel guests.

As stated above, the LAPL has identified three LAPL branch libraries that would serve the project: the Goldwyn Hollywood Regional Branch Library, the John C. Fremont Branch Library, and the Will and Ariel Durant Branch Library.

As reported in Table IV.K.5-2, the Goldwyn Hollywood Regional Branch Library is the library nearest the Project Site. Its current service population is 54,840 persons. With the addition of the Project's 2,433 new residents, the service population of this library would increase to 57,273 persons. As stated above, LAPL considers the possible development of a new branch library when populations in service areas reach 90,000 persons. Therefore, even if all of the Project's 2,433 new residents chose to patronize the Goldwyn Hollywood Regional Branch Library, they would not trigger LAPL's threshold considering the need for new facilities. Therefore, the Goldwyn Hollywood Regional Branch Library's existing service level would be maintained.

As reported in Table IV.K.5-2, the John C. Fremont Branch Library is located approximately 1.34 miles from the Project Site. Its current service population is 18,418 persons. With the addition of the Project's 2,433 new residents, the service population of this library would increase to 20,851 persons. Even with the Project's residential population increase, the population served by the John C. Fremont Branch Library would be below 90,000 persons. Therefore, even if all of the Project's 2,433 new residents chose to patronize the John C. Fremont Branch Library, they would represent a small population increase that would not trigger LAPL's threshold for the consideration of the need for new facilities.

As identified in Table IV.K.5-2, the Will and Ariel Durant Branch Library is located 1.07 miles from the Project Site. Its current service population is 92,851 persons. With the addition of the Project's 2,433 new residents, the service population of this library would increase to 95,284 persons. Thus, the Will and Ariel Durant Branch Library is currently operating serving a population over 90,000 and the Project would add to the existing service population. With a service population over 90,000 persons, the LAPL Branch Facilities Plan states that in such circumstances, the LAPL should consider adding a second branch to serve that area. However,

the LAPL has stated that there are no planned improvements to add capacity to the Will and Ariel Durant Branch Library through expansion, and there are no plans for the development of any other new libraries to serve this community.[20] As stated in the Branch Facilities Plan, new libraries for those with service populations over 90,000 may be considered, but are not required.

Given that the Project Site is closest to the Goldwyn Hollywood Regional Branch Library, and considering the greater size and resources of this library compared to the John C. Fremont Branch Library and the Will and Ariel Durant Branch Library, it is most likely that Project residents would look to the Goldwyn Hollywood Regional Branch Library as their first choice for library services. As discussed above, the Goldwyn Hollywood Regional Branch Library is far below a service population of 90,000 persons.

The two other libraries serving the Project Site, the John C. Fremont Branch Library and the Will and Ariel Durant Branch Library, are located farther from the Project Site. These libraries would be expected to reduce some of the demand placed on the Goldwyn Hollywood Regional Branch Library from Project residents. However, even if all of the Project residents should choose to patronize the John C. Fremont Branch Library, the addition of the Project's residential population to the existing service population of 18,418 people would not increase that library's service population from below the 90,000 population figure to above the 90,000 population figure at which the LAPL would consider building a new branch library. Therefore, in the case of the John C. Fremont Branch Library, a new branch library would not be considered. Unlike the John C. Fremont Branch Library, the Will and Ariel Durant Branch Library already serves a population where the LAPL should consider a new branch library. If the Project residents should choose to patronize the Will and Ariel Durant Branch Library, the library would continue to operate with a service population of just over 90,000 persons. The addition of all of the Project's residents would not increase the service population to over 90,000 since it is already serving a population of 92,851. As LAPL has stated that there are no planned improvements to add capacity to the existing libraries or to construct a new library, no expansion would be provided for the Will and Ariel Durant Branch Library.

Because the location and operational characteristics of any new or expanded libraries have not yet been identified by LAPL to specifically serve the Project,[21] it would require speculation to determine when and where any future new libraries would be developed. Therefore, at such time as the libraries are identified by LAPL,

20 LAPL, Business Office, correspondence dated December 13, 2018. Provided in Appendix M-5 of this Draft EIR.

21 LAPL, Business Office, correspondence dated December 13, 2018. Provided in Appendix M-5 of this Draft EIR.

the environmental impacts of those facilities would be evaluated by LAPL under CEQA as a project independent of the Project.

The City's CEQA Thresholds Guide considers whether a project includes features that would increase the demand for library services. The Project's residential units would be equipped to receive individual internet service, which provides information and research capabilities which studies have shown to reduce demand at physical library locations.[22,23] In addition, the Project would generate revenue for the City's general fund (in the form of property taxes, sales tax, business tax, transient occupancy tax, etc.) that could be used for the provision of public services such as library facilities. The Project's revenue to the General Fund would help offset the Project-related increase in demand for library services. Additionally, LAPL has been increasing their online services, including a variety of e-books, study materials, and support, available to users through the LAPL online resources.[24] These online sources would further reduce the Project's impacts on LAPL services.

As indicated above, while the service population of the Will and Ariel Durant Branch Library is just above 90,000 persons, the LAPL has indicated they have no plans for a new branch library. There are also two other libraries within one mile of the Will and Ariel Durant Branch Library that could serve the Project. Furthermore, in consideration of the Project's ability to provide internet service, generate revenue to the City's General Fund, and LAPL's ongoing expansion and availability of online resources, the Project's increase in demand to the Will and Ariel Durant would not be expected to result in a substantial increase in demand that would necessitate new or physically altered facilities. **Therefore, impacts resulting from the Project or the Project with the East Site Hotel Option operation would not create the need for new or physically altered library facilities, the construction of which would result in substantial adverse physical environmental impacts, in order to maintain acceptable service ratios or objectives. Therefore, impacts to libraries would be less than significant.**

Notwithstanding, the LAPL recommends a per capita fee of $200 to be used for staff, books, computers, and other library materials.[25] Fees would be paid by the Project Applicant, as applicable, as a Condition of Project Approval.

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

23 Tenopir, Carol. "Use and Users of Electronic Library Resources: An Overview and Analysis of Recent Research Studies," 2003.

24 Los Angeles Public Library, Strategic Plan 2015-2020, page 12.

25 LAPL, Business Office, correspondence dated December 13, 2018. Provided in Appendix M-5 of this Draft EIR.

(2) Mitigation Measures

Impacts regarding libraries would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding libraries were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

As analyzed in Section IV.J, *Population and Housing*, the Project would result in an estimated total population of 2,433 persons, while the Project with the East Site Hotel Option would result in an estimated total population of 2,140 persons. Therefore, the Project's higher population is analyzed herein to provide a conservative analysis of cumulative impacts. However, conclusions regarding the cumulative impact analysis and impact significance for the Project presented below are the same and also apply to the Project with the East Site Hotel Option.

(1) Impact Analysis

Chapter III, *Environmental Setting,* of this Draft EIR, lists the 150 related projects identified by the City that are anticipated to be developed within the Project Site vicinity. However, because the LAPL determines service populations based on the number of residents living in the areas assigned to specific libraries, as discussed above, this cumulative impact analysis on libraries is based on the population that would be generated by the 123 related projects located within the City of Los Angeles that include residential housing and that would be located within the boundaries of the library districts identified by the LAPL serving the Project. Those related residential projects are listed in **Table IV.K.5-3**, *Cumulative Population in Library Service Areas.*

TABLE IV.K.5-3
ESTIMATED CUMULATIVE POPULATION IN LIBRARY SERVICE AREAS

Map No.[a]	Project Address	DU	Resident Population[b,c]
1	6230 W. Yucca Street	116	281
4	6220 W. Yucca Street	191	463
6	6200 W. Hollywood Boulevard	952	2,304
8	6140 Hollywood Boulevard	27	66
10	6100 W. Hollywood Boulevard	220	533
11	1723 N. Wilcox Avenue	68	165
13	6436 W. Hollywood Boulevard	220	533
14	1546 N. Argyle Avenue	276	668

TABLE IV.K.5-3
ESTIMATED CUMULATIVE POPULATION IN LIBRARY SERVICE AREAS

Map No.[a]	Project Address	DU	Resident Population[b,c]
15	1540 N. Vine Street	306	741
17	1921 N. Wilcox Avenue	150	363
24	6250 Sunset Boulevard	200	484
25	6201 W. Sunset Boulevard	731	1,770
28	6230 W. Sunset Boulevard	200	484
31	6200 W. Sunset Boulevard	270	654
32	6121 W. Sunset Boulevard	200	484
36	6400 W. Sunset Boulevard	200	484
38	1717 N. Bronson Avenue	89	216
39	6650 W. Franklin Avenue	68	165
40	6007 Sunset Boulevard	146	354
41	1360 N. Vine Street	429	1,039
42	6322 DeLongpre	250	605
44	1718 N. Las Palmas Avenue	224	543
45	5939 W. Sunset Boulevard	299	724
46	1603 N. Cherokee Avenue	66	160
47	1749 N. Las Palmas Avenue	71	172
48	1341 Vine Street	250	605
51	1601 N. Las Palmas Avenue	86	209
52	1824 N. Highland Avenue	118	286
53	1311 Cahuenga Boulevard	375	908
54	6758 W. Yucca Street	270	654
58	1310 N. Cole Avenue	375	908
60	6701 W. Sunset Boulevard	950	2,299
61	5750 W. Hollywood Boulevard	161	390
63	1610 N. Highland Avenue	248	601
65	1149 N. Gower Street	57	138
68	1411 N. Highland Avenue	76	184
70	5606 Harold Street	54	131
71	5632 W. De Longpre Avenue	185	448
72	7046 Hollywood Boulevard	42	102
73	5627 Fernwood Avenue	59	143
74	1233 N. Highland Avenue	72	175
77	5550 W. Hollywood Boulevard	278	673
79	1657 N. Western Avenue	107	259
80	5525 W. Sunset Boulevard	293	710
83	1868 N. Western Avenue	87	211

TABLE IV.K.5-3
ESTIMATED CUMULATIVE POPULATION IN LIBRARY SERVICE AREAS

Map No.[a]	Project Address	DU	Resident Population[b,c]
84	6677 W. Santa Monica Boulevard	695	1,682
85	NWC Sunset & Western	247	598
86	1118 N. McCadden	192	465
90	7107 W. Hollywood Boulevard	410	993
91	7120 W. Sunset Boulevard	44	107
92	5420 W. Sunset Boulevard	735	1,779
93	901 N. Vine Street	76	184
94	1350 N. Western Avenue	204	494
95	5661 W. Santa Monica Boulevard	437	1,058
96	6901 W. Santa Monica Boulevard	231	560
97	5460 W. Fountain Avenue	75	182
98	6914 W. Santa Monica Boulevard	374	906
104	733 N. Hudson Avenue	46	112
105	712 N. Wilcox Avenue	100	242
106	707 N. Cole Avenue	84	204
108	5570 W. Melrose Avenue	52	126
112	904 N. La Brea Avenue	169	409
113	2864 N. Cahuenga Boulevard	300	726
114	5245 Santa Monica Boulevard	32	78
115	7510 W. Sunset Boulevard	236	572
116	6915 Melrose Avenue	13	32
117	525 Wilton Place	88	213
118	4900 W. Hollywood Boulevard	200	484
Related Projects Total		**15,152**	**36,695**
Project		*1,005*	2,433
Total With Project		**16,157**	**39,128**

[a] Corresponds with Figure III-1 and Table III-1 of this Draft EIR.

[b] Average household size is based on 2017 Census American Community Survey 5-Year Estimate data (2013–2017), www.census.gov/programs-surveys/acs/technical-documentation/table-and-geography-changes/2015/5-year.html, per correspondence with Jack Tsao, Housing Planner, Los Angeles Department of City Planning, July 31, 2019.

[c] Totals are rounded up to the nearest whole number. For detailed calculations, see Section IV.J, *Population and Housing,* of this Draft EIR.

SOURCE: ESA, 2020.

It is estimated that there would be 36,695 new residents if all of the related residential projects listed in Table IV.K.5-3 are approved by the City to the Applicants' requested density and built to the maximum approved residential

density. With the addition of the Project's estimated population of up to 2,433 residents, the cumulative total of new residents would be up to 39,128 residents.

Based on the analysis, the Project, in combination with the related projects, could require new or expanded libraries. For example, the Goldwyn Hollywood Regional Branch Library could potentially have a service population of over 90,000 with the added population from the related projects and the Will and Ariel Durant's existing service population of over 90,000 persons would increase. In this scenario, in accordance with LAPL's standards, a new Branch library would be considered.

Library usage is expected to be distributed among all three libraries identified by the LAPL as serving the Project, as well as any other libraries outside of the three identified specifically for the Project that are located closer to those related projects farthest from the Project Site. The Central Library, while not designated as a nearby library that would service the Project Site, services the entire City and would, therefore, be able to serve all related projects and the Project. Additionally, the Central Library is located at 630 West 5th Street and is within 0.2 miles of the Metro 7th Street/Metro Center Station, which directly services the Metro Red Line making the Central Library easily accessible from the Project Site. This analysis is also overly conservative because it does not take into account related projects that may not be built or that may be reduced in size or the demolition of any existing housing that may be required to accommodate the new development.

The majority of the related projects located nearest to the Project Site within the Hollywood Community Plan area would likely patronize the Goldwyn Hollywood Regional Branch Library as it would be the closest to their respective locations. Related projects that are located farther south would be within the library service area of the John C. Fremont Branch Library located at 6121 Melrose Avenue. Related projects that are located farther west would be within the library service area of the Will and Ariel Durant Branch Library located at 7140 West Sunset Boulevard.

Similar to the Project, each related project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, transient occupancy tax, etc.) that could be applied to enhancing library services in the Community Plan area, as deemed appropriate by the City. These revenues to the City's General Fund would help offset the increase in demand for library services as a result of the Project and the related projects.

Furthermore, as discussed above, with the shift in technology from books to computers, the demand for library facilities is changing.[26] As stated above,

[26] Pew Research Center, Libraries, patrons, and e-books, Part 5: Libraries in transition, June 22, 2012, http://www.pewinternet.org/2012/06/22/part-5-libraries-in-transition/, accessed February 28, 2019.

members of the LAPL have access to thousands of podcasts, audiobooks, media publications, and instructional content online and via smartphone applications made available to library patrons.[27] The availability of such resources reduces the demand for physical library space.

Additionally, because the location and operational characteristics of any new or expanded libraries have not yet been identified by LAPL and the related projects,[28] it would be speculative to determine how any future shortages would be addressed, including where and what those facilities may be. Therefore, at such time as the libraries are identified by LAPL, the environmental impacts of those facilities would be evaluated by LAPL under CEQA as a project independent of the Project.

Based on the above considerations, the Project's contribution to cumulative impacts on libraries would not be cumulatively considerable. This determination acknowledges that new or expanded library facilities may be considered to accommodate the demands associated with cumulative population growth, since what environmental impacts, if any, such new or expanded facilities might create cannot be known until the City identifies new or expanded facility sites. Moreover, the City will be required to conduct CEQA review when and if such new or expanded facilities are identified. **Therefore, the Project's and the Project with the East Site Hotel Option's contribution to cumulative impacts would not be cumulatively considerable. As such, cumulative impacts on libraries would be less than significant.**

Notwithstanding, the LAPL recommends a per capita fee of $200 to be to be used for staff, books, computers, and other library materials.[29] Fees would be paid by the Project Applicant, and the related projects' applicants, as applicable, as a condition of Project approval.

(2) Mitigation Measures

Cumulative impacts regarding libraries were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts regarding libraries were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

27 LAPL, About the Library, Los Angeles Public Library By The Numbers (FY) 2017-2018.
28 LAPL, Business Office, correspondence dated December 13, 2018. Provided in Appendix M-5 of this Draft EIR.
29 LAPL, Business Office, correspondence dated December 13, 2018. Provided in Appendix M-5 of this Draft EIR.

IV. Environmental Impact Analysis

L. Transportation

1. Introduction

This section assesses potential Project impacts based on the Transportation Assessment for the Hollywood Center Project (TA) prepared by Fehr & Peers, dated April 2020 and included as Appendix N-1 of this Draft EIR. The TA was prepared in accordance with the Los Angeles Department of Transportation's (LADOT's) Transportation Assessment Guidelines (TAG) adopted in July 2019 and pursuant to a memorandum of understanding (MOU) with LADOT dated December 3, 2019, documenting its assumptions and technical methodologies. The LADOT MOU is included in Appendix A of the TA. LADOT reviewed the TA and provided an approval letter of the TA on April 10, 2020, which is included as Appendix N-2 of this Draft EIR.

In accordance with the TAG and consistent with the City CEQA Transportation Thresholds (adopted July 30, 2019), the CEQA-required analysis to be included within this Draft EIR section includes an assessment of whether the Project would result in: 1) potential conflicts with transportation-related plans, ordinances, or policies; 2) a substantial increase in vehicle miles traveled (VMT); or 3) increased hazards due to a geometric design feature or incompatible use. In addition, in accordance with the City's CEQA Transportation Thresholds, an assessment of whether the Project would result in inadequate emergency access is included.

The TAG also requires assessment of "non-CEQA" transportation issues, which include: 1) pedestrian, bicycle, and transit access;[1] 2) project access, safety, and circulation; 3) construction traffic; and 4) residential street cut-through analysis. The analyses of these "non-CEQA" issues are included in the TA. However, since they are non-CEQA items, they are not analyzed in this EIR, unless they relate to the assessment of potential conflicts with transportation-related plans, ordinances, or policies mentioned above. In addition, an analysis of intersection levels of service is included as appendices to the TA for informational purposes only and is similarly a non-CEQA issue. As part of the informational level of service analysis,

[1] In addition to the non-CEQA pedestrian, bicycle, and transit access topics identified in the TAG, this EIR considers any environmental impacts that the Project could have related to potential conflicts with a program, plan, ordinance or policy addressing transit, roadway, bicycle, and pedestrian facilities (pursuant to Threshold (a), as shown in Subsection IV.L.3.(a), *Thresholds of Significance*).

a subset of study locations that assumes full closure of Hollywood Boulevard between Orange Drive and Highland Avenue intersection is assessed.

2. Environmental Setting

a) Regulatory Framework

(1) State

(a) Complete Streets Act

The Complete Streets Act (Assembly Bill [AB] 1358; Government Code Sections 65040.2 and 65302) was signed into law in 2008. The law requires that when updating the part of a local general plan that addresses roadways and traffic flows, cities and counties ensure those plans account for the needs of all roadway users. Specifically, the legislation requires cities and counties to ensure that local roads and streets adequately accommodate the needs of bicyclists, pedestrians, and transit riders, as well as motorists.

(b) Senate Bill No. 743 / CEQA Guidelines Section 15064.3

California Senate Bill (SB) 743, which became effective on January 1, 2014, requires the focus of transportation analyses to shift from driver delay to the reduction of greenhouse gas (GHG) emissions, the creation of multimodal networks, and the promotion of a mix of land uses. SB 743 directed the Governor's Office of Planning and Research (OPR) to prepare and develop revised guidelines for determining the significance of transportation impacts resulting from projects located within transit priority areas (TPAs).

CEQA Guidelines Section 15064.3, Determining the Significance of Transportation Impacts, indicates that "…vehicle miles traveled is the most appropriate measure of transportation impacts." The revised guidelines require that lead agencies remove automobile delay, as described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion, as a criterion for determining a significant impact on the environment pursuant to CEQA, except in locations specifically identified in the revised guidelines, if any. In accordance with this requirement, CEQA Guidelines Section 15064.3(a), adopted in December 2018, states "a project's effect on automobile delay does not constitute a significant environmental impact."

In addition, CEQA Guidelines Section 15064.3(c) states that the provisions of Section 15064.3 shall apply statewide beginning on July 1, 2020, but that a lead agency may elect to be governed by its provisions immediately upon adoption. As noted below, on July 30, 2019, the City adopted VMT as part of its CEQA

Transportation Thresholds as a criterion to determine transportation impacts, pursuant to SB 743 and the recent changes to CEQA Guidelines Section 15064.3.[2]

SB 743 also added Public Resources Code (PRC) Section 21099, which provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment."[3] 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.[4] A TPA is defined as an area within 0.5 mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.332 of Title 23 of the Code of Federal Regulations."[5] PRC 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the A.M. and P.M. peak commute periods."[6] The Project is located in a TPA as defined in PRC Section 21099 and confirmed by the City of Los Angeles Zone Information Map Access System (ZIMAS).[7,8]

(c) Congestion Management Program

The CMP was established statewide in 1990 to implement Proposition 111, tying appropriation of new gas tax revenues to congestion reduction efforts. CMP is managed at the countywide level and primarily uses an LOS performance metric, which is inconsistent with more recent state efforts to transition to VMT-based performance metrics. California Government Code Section 65088.3 allows counties to opt out of CMP requirements without penalty, if a majority of local jurisdictions representing a majority of a county's population formally adopt resolutions requesting to opt out of the program.

On June 20, 2018, Los Angeles County Metropolitan Transportation Authority (Metro) initiated a process to gauge the interest of local jurisdictions in opting out of State CMP requirements. On July 30, 2019, the Los Angeles City Council passed a resolution to opt out of the CMP program, and on August 28, 2019, Metro

2 City of Los Angeles, City of Los Angeles Adoption of Vehicle Miles Traveled as the Transportation Impact Metric under the California Environmental Quality Act, August 9, 2019.
3 California Public Resources Code (PRC), Section 21099(d)(1).
4 PRC, Section 21099(a)(4).
5 PRC, Section 21099(a)(7).
6 PRC, Section 21064.3.
7 City of Los Angeles Department of City Planning, ZIMAS, Parcel Report for 1750 N. Vine Street, Hollywood.
8 City of Los Angeles, Zoning Information No. 2451, Transportation Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA.

announced that the thresholds had been reached and the County of Los Angeles had opted to be exempt from the CMP. As such, the provisions of the CMP no longer apply to any of the 89 local jurisdictions in Los Angeles County. Accordingly, CMP analysis is no longer included in City of Los Angeles environmental documents.

(2) Local

(a) City of Los Angeles CEQA Transportation Thresholds

On July 30, 2019, the City adopted the City of Los Angeles CEQA Transportation Thresholds. The thresholds include using VMT as a criterion to determine transportation impacts, pursuant to SB 743 and the recent changes to CEQA Guidelines Section 15064.3.[9] LADOT revised the City's guidelines for evaluating project-level transportation issues to ensure that proposed development projects would be consistent with City and mobility objectives (e.g., Mobility Plan 2035).

(b) Transportation Assessment Guidelines

Safety, sustainability, smart growth, and the reduction of GHG emissions - in addition to traditional mobility considerations - are prime concerns for the City of Los Angeles. LADOT established the TAG in July 2019 to effectuate a review process that advances the City's vision of developing a safe, accessible, well-maintained, and well-connected multimodal transportation network. The TAG was developed to identify land use development and transportation projects that may impact the transportation system, to ensure proposed land use development projects achieve site access design requirements and on-site circulation best practices, to define whether off-site improvements are needed, and to provide step-by-step guidance for assessing impacts and preparing TA studies.

Project applicants and consultants must follow the procedures and standards set forth in the TAG when preparing and submitting a TA to ensure a timely review by LADOT. However, the TAG requirements may differ in certain areas of the City where specific plans or similar area specific ordinances establish distinct guidelines.

The TAG includes guidelines, methods, and impact criteria for CEQA considerations that focus on VMT, geometric hazards, and policy conflicts. The TAG also establishes a framework for various non-CEQA analyses including a pedestrian, bicycle, and transit access assessment, a project access, safety, and circulation assessment, project construction, and residential street cut-through analysis. Each area of analysis is described in the TAG with a discussion of screening criteria, the methodology for analysis, impact criteria, and potential mitigation options.

[9] City of Los Angeles, City of Los Angeles Adoption of Vehicle Miles Traveled as the Transportation Impact Metric under the California Environmental Quality Act, August 2019.

(c) Mobility Plan 2035 and 2010 Bicycle Plan

Mobility Plan 2035, which was adopted by the City of Los Angeles City Council on January 20, 2016, is a comprehensive update of the City's Transportation Element and incorporates "complete streets" principles.[10] Government Code Sections 65302(b)(2)(A) and (B) require a circulation element (i.e., Mobility Plan 2035) to provide for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways. "All users" by definition in the statute is "bicyclists, children, persons with disabilities, motorists, movers of commercial goods, pedestrians, users of public transportation, and seniors."[11] This requirement was established as part of Assembly Bill 1358, which is referred to as the California Complete Streets Act, as well as the California Department of Transportation (Caltrans) Deputy Directive DD-64-R1, Complete Streets: Integrating the Transportation System.

Mobility Plan 2035 includes goals that define the City's five main priorities: 1) Safety First; 2) World Class Infrastructure; 3) Access for All Angelenos; 4) Collaboration, Communication and Informed Choices; and 5) Clean Environmental & Healthy Communities. Mobility Plan 2035 serves to meet the goal in the Regional Transportation Plan to decrease the VMT per capita by 5 percent every five years, to 20 percent by 2035 and to meet a nine percent per capita GHG reduction by 2020, and a 16 percent per capita reduction by 2035.

Mobility Plan 2035 includes roadway definitions and designations pursuant to updated policies and current transportation needs in the City, including the following:

- Freeways – High-volume, high-speed roadways with limited access provided by interchanges that carry regional traffic through and do not provide local access to adjacent land uses.

- Arterial Streets – Major streets that serve through traffic and provide access to major commercial activity centers. Arterials are divided into two categories:

  - Boulevards represent the widest streets that typically provide regional access to major destinations and include two categories:

    - Boulevard I provides up to four travel lanes in each direction with a target operating speed of 40 miles per hour (mph).

    - Boulevard II provides up to three travel lanes in each direction with a target operating speed of 35 mph.

10 City of Los Angeles Department of City Planning, Mobility Plan 2035: An Element of the General Plan, adopted by City Council, January 20, 2016.

11 California Legislative Information, Assembly Bill No. 1358.

  - Avenues pass through both residential and commercial areas and include three categories:
    - Avenue I provide up to two travel lanes in each direction with a target operating speed of 35 mph.
    - Avenue II provide up to two travel lanes in each direction with a target operating speed of 30 mph.
    - Avenue III provide up to two travel lanes in each direction with a target operating speed of 25 mph.

- Collector Streets – Generally located in residential neighborhoods and provide access to and from arterial streets for local traffic and are not intended for cut-through traffic. Collector Streets provide one travel lane in each direction with a target operating speed of 25 mph.

- Local Streets – Intended to accommodate lower volumes of vehicle traffic and provide parking on both sides of the street. Local Streets provide one travel lane in each direction with a target operating speed of 15 to 20 mph. Local Streets can be:
  - Continuous local streets that connect to other streets at both ends.
  - Non-Continuous local streets that lead to a dead-end.

In addition, Mobility Plan 2035 identifies corridors proposed to receive improved bicycle, pedestrian, transit and vehicle infrastructure improvements. Each of the networks are defined as the following:

- The Neighborhood Enhanced Network (NEN) identifies a selection of streets that provide comfortable and safe routes for localized travel of slower-moving modes, such as walking, bicycling, or other slow speed motorized means of travel.

- The Transit Enhanced Network (TEN) identifies a network of arterial streets prioritized to improve existing and future bus service for transit riders.

- The Bicycle Enhanced Network (BEN) identifies a network of streets that will receive treatments that prioritize bicyclists. The bicycle network is described in Policy 2.6 of Mobility Plan 2035 and includes gap closures for the protected bicycle lane system, bicycle paths, and Tier 1 protected Bicycle Lanes, which are bicycle facilities on arterial roadways with physical separation.

- The Bicycle Lane Network (BLN) identifies a network of streets that will receive treatments that prioritize bicyclists, specifically Tier 2 and Tier 3 Bicycle Lanes. Tier 2 and Tier 3 Bicycle Lanes are facilities on roadways with striped separation. Tier 2 Bicycle Lanes are those more likely to be built by 2035.

- The Vehicle Enhanced Network (VEN) identifies streets that prioritize vehicular movement and offer safe, consistent travel speeds and reliable travel times.

- The Pedestrian Enhanced Districts (PEDs) identify where pedestrian improvements on arterial streets could be prioritized to provide better walking connections to and from the major destinations within communities.

The 2010 Bicycle Plan, which is part of Mobility Plan 2035, guides the development of a Citywide bicycle transportation system and establishes standards for development of these facilities, as well as criteria for prioritization of development of designated routes. With a stated policy to reduce automobile trips and GHG emissions by making five percent of all daily trips and three percent of commute trips bicycle trips by 2020, the 2010 Bicycle Plan establishes a Backbone Bikeway Network and Neighborhood Bikeway Network linking Regional Centers to promote bicycle usage.

(d) Hollywood Community Plan

The Project Site is located within the boundaries of the Hollywood Community Plan. The Community Plan was initially adopted in 1988 and addresses growth and the arrangement of land uses within its boundaries through the year 2010.[12]

The 1988 Hollywood Community Plan includes the following transportation and circulation objectives and policies that are applicable to the Project:

> **Objective 6**: To make provision for a circulation system coordinated with land uses and densities and adequate to accommodate traffic; and to encourage the expansion and improvement of public transportation service.

The Community Plan also includes a circulation policy section and a circulation public improvement program. The policy section provides a discussion regarding public provision of an improved public transportation system and/or additional highways and freeways. The Community Plan commits to following the standards in, and incorporates by reference those standards and other guidelines in, the Highways and Freeways Element of the Los Angeles General Plan and the transportation program described in Section 518.1 of the Hollywood Redevelopment Plan. The public improvement program calls for improvement of transportation facilities, generally, and a specific set of roadway improvements for facilities located outside of the Project Site vicinity.

[12] City of Los Angeles Department of City Planning, Hollywood Community Plan, adopted December 13, 1988, p. HO-2.

(e) Hollywood Redevelopment Plan

The Hollywood Redevelopment Plan (Redevelopment Plan) was first adopted in 1986 and was last amended in May 2003.[13] The Redevelopment Plan will terminate on May 7, 2027.[14] Refer to Section IV.H, *Land Use and Planning*, for further background and details of this Plan. With regard to Transportation, the Redevelopment Plan goals include "Support and encourage a circulation system which will improve the quality of life in Hollywood, including pedestrian, automobile, parking and mass transit systems with an emphasis on serving existing facilities and meeting future needs."[15] In addition, Section 518 addresses circulation, parking, and loading facilities.[16] As indicated therein, traffic studies are encouraged for any projects with the potential for significant circulation impacts, with applicable mitigation measures required as conditions of approval for new projects. The Redevelopment Plan also encourages creative solutions to parking, such as the shared use of parking areas, flexible parking programs, public parking structures, and standards to ensure that parking is available for the Project area. The Redevelopment Plan also indicates that replacement parking shall be provided for removed parking spaces in Regional Center Commercial designated areas, and within reasonable proximity to users.

(f) LADOT Manual of Policies and Procedures

The Manual of Policies and Procedures (MPP) is LADOT's document containing design standards and guidelines for driveways, striping, channelization, special signing, and traffic signal timing and operation.

(g) Vision Zero

Vision Zero: Eliminating Traffic Deaths in Los Angeles by 2025, is a traffic safety policy that promotes strategies to eliminate collisions that result in severe injury or death by 2025.[17] In this regard, it promotes a culture of shared responsibility, where both designers and policymakers, not just the users (i.e., motorists, bicyclists and pedestrian), are held accountable for deaths on streets.

Vision Zero programs typically address safety through coordinated engineering, enforcement, and education efforts. Traditional road design models tend to facilitate faster movement of cars, but the Vision Zero philosophy calls for reordering the priorities to make roads as safe as possible, particularly for more vulnerable street users like cyclists and pedestrians. Strategies to slow car traffic to speeds less likely to cause death and serious injury to pedestrians and bicyclists include wider sidewalks, reduced or narrowed car lanes, added bike lanes, bulb-

13 City of Los Angeles, Hollywood Redevelopment Plan, adopted May 7, 1986, amended May 20, 2003.
14 CRA/LA, A Designated Local Authority, Project Areas, Hollywood Project Area Overview, http://www.crala.org/internet-site/Projects/Hollywood/index.cfm, accessed May 19, 2018.
15 City of Los Angeles, Hollywood Redevelopment Plan, May 7, 1986, Section III, Goal 12, p. 4.
16 City of Los Angeles, Hollywood Redevelopment Plan, May 7, 1986, Section 518, pp. 37-40.
17 City of Los Angeles, Vision Zero Los Angeles 2015-2025, August 2015.

outs of curb corners and improved signals. Traffic enforcement efforts focus on infractions most likely to cause death and serious injury, such as speeding, running red lights and not yielding to pedestrians. Some places rely on automated speed and red light enforcement cameras. Education campaigns aim to raise public awareness of the problem, reframe assumptions about traffic safety, and gain support for changes.

LADOT has collected data on traffic crashes in the City and identified a network of street segments with the highest share of serious and fatal crashes, which it calls the High Injury Network (HIN). The HIN, composed of only 6 percent of streets in the City, account for two-thirds of all serious and fatal crashes. Targeting improvements on these streets is a Vision Zero goal that could significantly reduce fatalities.

(h) Los Angeles Municipal Code

LAMC Section 12.37 states that no building or structure shall be erected or enlarged, and no building permit shall be issued therefore, on any R3 or less restrictive zone; or in any lot in the RD1.5, RD2, or R3 Zones, if the lot abuts a major or secondary highway or collector street unless one of the street has been dedicated and improved to the full width to meet the standards for a highway or collector street as provided in the LAMC.

(i) Plan for a Healthy Los Angeles

Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan (Plan for a Healthy Los Angeles) provides guidelines to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues.[18] The Plan for a Healthy Los Angeles addresses greenhouse gas emission reductions and social connectedness, which are affected by the land use pattern and transportation opportunities.

(j) Citywide Design Guidelines

The Citywide Design Guidelines (Design Guidelines) identify urban design principles to guide architects and developers in designing high-quality projects that meet the City's functional, aesthetic, and policy objectives and help foster a sense of community.[19] The Design Guidelines are organized around three design approaches: pedestrian-first design, 360-degree design, and climate-adapted design.

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18 City of Los Angeles Department of City Planning. Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan, March 2015.

19 City of Los Angeles Department of City Planning Urban Design Studio. *Citywide Design Guidelines,* October 2019.

(k) Mobility Hubs Reader's Guide

Mobility Hubs: A Reader's Guide (Mobility Hub Guide) provides guidance for enhancing transportation connections and multi-modal improvements in proximity to new or existing transit stations.[20] The Mobility Hub Guide focuses on enhancing bicycle connections, providing vehicle sharing services, improving bus infrastructure, providing real-time transit and wayfinding information, and enhancing walkability and pedestrian connections.

(l) Walkability Checklist

The Walkability Checklist – Guidance for Entitlement Review (Walkability Checklist) serves as a guide for enhancing pedestrian movement, access, comfort, and safety to contribute to the overall walkability of the City.[21] Transportation-applicable topics include: sidewalks, crosswalks/street crossings, on-street parking, building orientation, and off-street parking and driveways.

b) Existing Conditions

(1) Street System

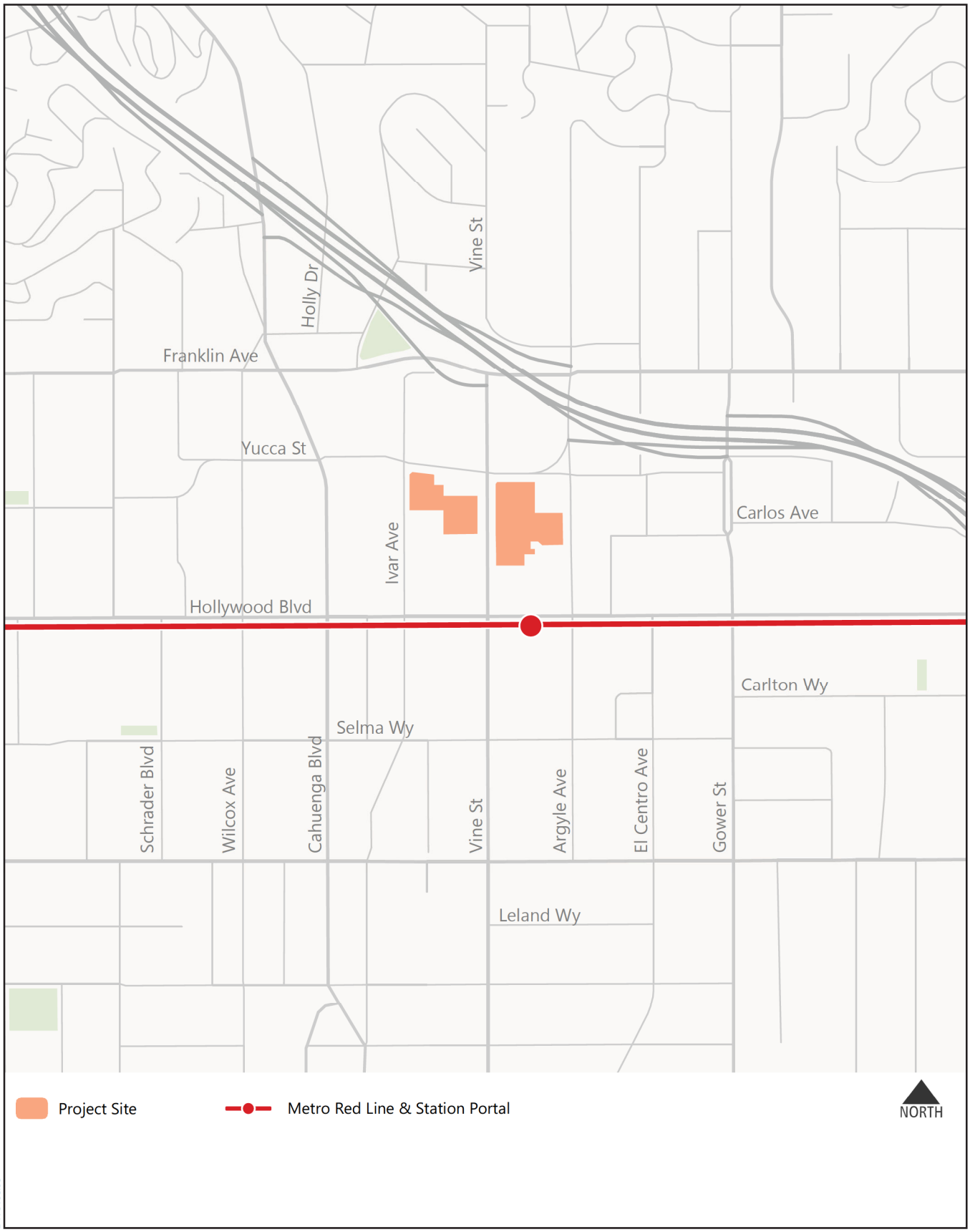
The Project Site is located within the Hollywood Community Plan area and the Hollywood Redevelopment Plan area of the City of Los Angeles. The Project Site includes a geographical area generally bounded by Ivar Avenue to the west, Yucca Street to the north, Hollywood Boulevard to the south, and Argyle Avenue to the east. Vine Street bisects the Project Site, which creates two development subareas referred to as the "West Site" and the "East Site." **Figure IV.L-1**, *Local Roadway Network*, illustrates the local roadway network and the Metro Red Line and stations in the vicinity. The streets in the Project vicinity are under the jurisdiction of the City of Los Angeles. Freeways are under the jurisdiction of Caltrans.

(a) Freeways

Primary regional access to the Project Site is provided by Hollywood Freeway (US-101). US-101 runs in northbound/southbound directions and is located east and north of the Project Site due to its varied route in the local Project vicinity. US-101 extends from the Los Angeles County border to downtown Los Angeles. In the Project vicinity, US-101 provides four lanes in each direction. The nearest interchanges are located at Cahuenga Boulevard, Vine Street, Gower Street, Hollywood Boulevard, and Sunset Boulevard.

[20] City of Los Angeles Department of City Planning. *Mobility Hubs: A Reader's Guide,* 2016.

[21] City of Los Angeles Department of City Planning. The *Walkability Checklist – Guidance for Entitlement Review*, November 2008.



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SOURCE: Fehr & Peers, 2020

Hollywood Center Project

Figure IV.L-1
Local Roadway Network

(a) Roadways

The characteristics of the major roadways in the Project vicinity are described below.

(i) East/West Roadways

Yucca Street is designated as a local street in the Project area and runs directly north of the Project Site. Yucca Street provides one lane in each direction with parking permitted on both sides of the street. Yucca Street, west of Vine Street along the West Site frontage, is part of the PED and included as a Tier 2 bicycle lane in the BLN in Mobility Plan 2035.

Franklin Avenue is designated as an Avenue II except between Cahuenga Boulevard and Normandie Avenue where it is designated as an Avenue I. It runs one block north of the Project Site and provides two through lanes in each direction. Parking is permitted along portions of Franklin Avenue. Left-turn channelization is provided at most intersections. Franklin Avenue is part of the NEN, bicycle lane network, and PED in Mobility Plan 2035.

Hollywood Boulevard is designated as an Avenue I and runs half a block south of the Project Site. In the Project area, Hollywood Boulevard provides two through lanes in each direction. Parking is permitted along portions of Hollywood Boulevard. Left-turn channelization is provided at most intersections, including its intersection at Ivar Avenue, Vine Street, and Argyle Avenue. Hollywood Boulevard, south of the Project Site, is part of the TEN, BEN, and PEDs in Mobility Plan 2035.

Selma Avenue is designated as a local street and runs one block south of Hollywood Boulevard. In the Project area, Selma Avenue provides one lane in each direction. Parking is provided along portions on both sides of the street. Selma Avenue is part of the NEN in Mobility Plan 2035.

(i) North/South Roadways

Wilcox Avenue is designated as an Avenue III and runs two blocks west of the Project Site. Wilcox Avenue provides two lanes in each direction with parking permitted on both sides of the street. Two-way left-turn lanes are provided along portions of Wilcox Avenue, and left-turn channelization is provided at most intersections. Wilcox Avenue is part of the PED in Mobility Plan 2035.

Cahuenga Boulevard is designated as an Avenue II and runs one block west of the Project Site. Cahuenga Boulevard provides two lanes in each direction with parking permitted on both sides of the street. The portion of Cahuenga Boulevard north of Hollywood Boulevard is included in the Tier 2/Tier 3 bicycle facility, NEN, and PED in Mobility Plan 2035.

Ivar Avenue is designated as a local street in the Project area and runs directly west of the West Site. Ivar Avenue provides one lane in each direction with parking permitted on both sides of the street.

Vine Street is designated as an Avenue II in the Project area and bisects the Project Site. Vine Street provides two lanes in each direction with parking permitted on both sides of the street. Left-turn channelization is provided at most intersections, including its intersection at Yucca Street and Hollywood Boulevard. Vine Street, adjacent to the Project Site, is included as a Tier 2 bicycle lane in the BLN and part of the PEDs in Mobility Plan 2035.

Argyle Avenue is a local street in the Project area and is located directly east of the East Site. Argyle Avenue provides one lane in each direction, except for the segment between Yucca Street and Franklin Avenue, where two lanes in each direction are provided. Parking is permitted on both sides of the street, except for the segment between Hollywood Boulevard and Franklin Avenue, where parking is not allowed on the east side of the street. Left-turn channelization is provided at the intersection of Hollywood Boulevard and Argyle Avenue. Argyle Avenue, adjacent to the East Site, is included in the NEN in Mobility Plan 2035.

Gower Street is designated as an Avenue III in the Project area and runs two blocks east of the Project Site. Gower Street provides either one or two lanes in the northbound direction and one lane in the southbound direction. Parking is permitted on both sides of the street. Left-turn channelization is provided at most intersections. Gower Street is included in the NEN and PED in Mobility Plan 2035.

(2) Public Transit

The Project Site is located in a dense area of Hollywood served by numerous public transit lines. **Figure IV.L-2**, *Existing Transit Service*, shows the various transit lines providing service in the Project vicinity, while **Table IV.L-1**, *Existing Transit Service*, details the transit service near the Project Site. The Metro Red Line, five local Metro bus routes (Route 180, 210, 212/312, 217, and 222), a Metro Rapid bus route (Route 780), and three LADOT DASH lines (Hollywood, Beachwood Canyon, and Hollywood/Wilshire) serve the area and are described below.

Metro Red Line. The Metro Red Line is a heavy rail subway that provides service between North Hollywood and Downtown Los Angeles (Union Station). This line runs half a block south of the Project Site, beneath Hollywood Boulevard. The Metro Red Line has an average headway of 10 minutes during the weekday A.M. and P.M. peak periods. The Metro Red Line Hollywood/Vine Station is approximately 600 feet south of the Project Site.

Metro Line 217. Line 217 provides local service between Westchester immediately north of the Los Angeles International Airport (LAX) and Hollywood. This line runs south of the Project Site along Hollywood Boulevard. Line 217 has an average headway of 15 minutes during the weekday A.M. and P.M. peak periods.

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SOURCE: Fehr & Peers, 2020

Hollywood Center Project

Figure IV.L-2
Existing Transit Service

TABLE IV.L-1
EXISTING TRANSIT SERVICE

Transit Route	Operator	Service Type	Service From	Via	Weekday Headways	
					A.M.	P.M.
Red Line	Metro	Heavy Rail	North Hollywood to Union Station	Hollywood Blvd	10 mins.	10 mins.
217	Metro	Local	Los Feliz to Fox Hills	Hollywood Blvd	15 mins.	15 mins.
210	Metro	Local	Redondo Beach to Hollywood	Vine St	10-15 mins.	15-20 mins.
180/181	Metro	Local	Altadena/Pasadena to Hollywood	Hollywood Blvd	10-15 mins.	10-15 mins.
212/312	Metro	Local	Hawthorne to Hollywood	Hollywood Blvd	5-10 mins.	5-10 mins.
222	Metro	Local	Hollywood to Sunland	Hollywood Blvd	60 mins.	60 mins.
780	Metro	Rapid	Pasadena to Washington/Fairfax	Hollywood Blvd	10-15 mins.	10-15 mins.
Hollywood/ Wilshire	LADOT	Shuttle	Hollywood to Wilshire	Gower St/ Western Ave	25 mins.	25 mins.
Beachwood Canyon	LADOT	Shuttle	Hollywood to Beachwood Canyon	Beachwood Dr	25 mins.	25 mins.
Hollywood Clockwise/ Counterclockwise	LADOT	Shuttle	Hollywood (Vermont Ave to Highland Ave)	Hollywood Blvd	30 mins.	30 mins.

SOURCE: Fehr & Peers, TA, 2019.

Metro Line 210. Line 210 provides local service between Hollywood and Redondo Beach. This line runs between the West Site and East Site along Vine Street. Line 210 has average headways, ranging from 10 to 15 minutes during the weekday A.M. peak period and ranging from 15 to 20 minutes during the P.M. peak period.

Metro Line 180/181. Lines 180 and 181 share a route starting in Hollywood and through Pasadena. At this point the lines diverge with Line 180 ending in Altadena and Line 181 ending in eastern Pasadena. Lines 180/181 provide local service between Altadena or Pasadena and Hollywood. These lines run south of the Project Site along Hollywood Boulevard. Headways range from 10 to 15 minutes during the weekday A.M. and P.M. peak periods.

Metro Line 212/312. Lines 212/312 run from Hawthorne to Hollywood. These lines travel on La Brea Avenue, west of the Project Site and also along Hollywood Boulevard, south of the Project Site. Lines 212/312 have headways ranging from 5 to 10 minutes during the weekday A.M. and P.M. peak periods. Line 212 operates seven days a week while Line 312 operates Monday through Friday. Both lines include short line turn around loops in Inglewood and Hollywood. Both routes also have limited stop zones between Sunset Boulevard and Obama Boulevard, Monday through Friday, in the northbound direction during the morning peak and in the southbound direction during the P.M. peak.

Metro Line 222. Line 222 provides local service between Sunland and Hollywood. This line runs south of the Project Site along Hollywood Boulevard, and west of the Project along Orange Drive and Highland Avenue. Line 222 has an average headway of 60 minutes during the weekday A.M. and P.M. peak periods.

Metro Rapid Line 780. Metro Rapid Line 780 provides express service between Pasadena and Mid-City near Washington Boulevard and Fairfax Avenue. This line runs south of the Project Site along Hollywood Boulevard. Line 780 has headways ranging from 10 to 15 minutes during the weekday A.M. and P.M. peak periods.

LADOT DASH Hollywood/Wilshire. The Hollywood/Wilshire DASH provides circulator service between the Wiltern Theatre, which is located at the western edge of Koreatown, and the Pantages Theatre immediately south of the East Site. There are several stops near the Project Site on Sunset Boulevard. The Hollywood/Wilshire DASH has an average headway of 25 minutes during the weekday A.M. and P.M. peak periods.

LADOT DASH Beachwood Canyon. The Beachwood Canyon DASH provides circulator service between Hollywood's Beachwood Canyon neighborhood and Sunset Boulevard. There are several stops near the Project Site on Vine Street and Sunset Boulevard. The Beachwood Canyon DASH has an average headway of 25 minutes during the weekday A.M. and P.M. peak periods.

LADOT DASH Hollywood. The Hollywood DASH provides circulator service in Hollywood in the area generally bounded by Vermont Avenue on the east, Highland Avenue on the west, Franklin Avenue on the north, and Fountain Avenue on the south. There are several stops near the Project Site on Hollywood Boulevard and Argyle Avenue (north of Hollywood Boulevard). The Hollywood DASH has an average headway of 30 minutes during the weekday A.M. and P.M. peak periods.

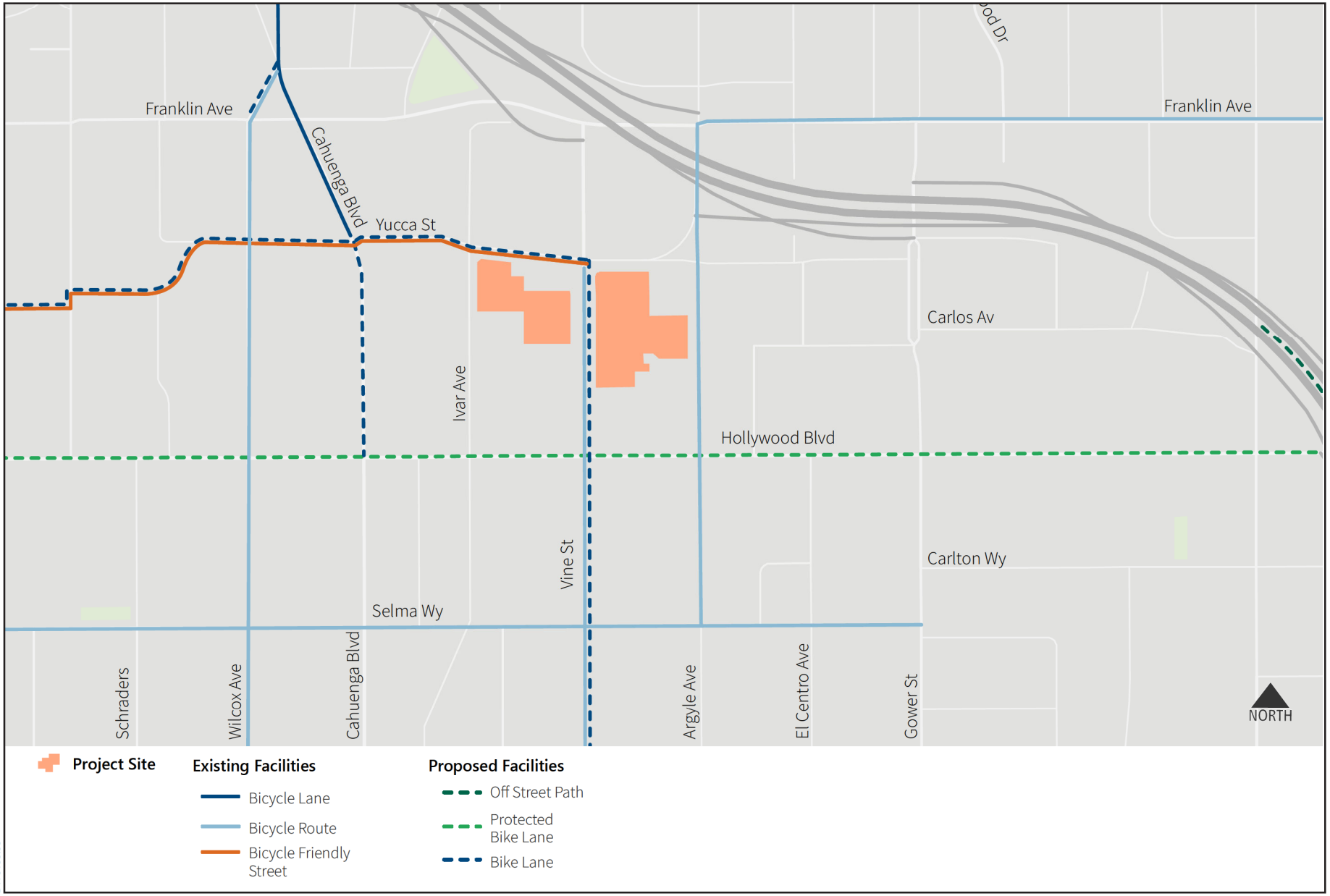
(3) Bicycle and Pedestrian Facilities

Figure IV.L-3, *Existing and Proposed Bicycle Facilities*, shows existing and planned designated bicycle facilities in the Project area. Wilcox Avenue, Vine Street, Selma Avenue, Argyle Avenue, and Franklin Avenue are designated as roadways intended to share the road with bicyclists and provide shared lane markings; these roads are also known as bicycle routes. Yucca Street is designated as a roadway intended to be bicycle friendly. The City of Los Angeles Bicycle Plan defines a bicycle-friendly street as a bike route that includes engineering treatments, in addition to signage and shared lane markings, such as those found on Yucca Street between Vine Street and Highland Avenue.

Mobility Plan 2035 identifies corridors proposed to receive improved bicycle, pedestrian, and vehicle infrastructure improvements. Tier 1 Protected Bicycle Lanes are bicycle facilities that are separated from vehicular traffic. Tier 2 and Tier 3 Bicycle Lanes are facilities on roadways with striped separation, and a bicycle path is a bicycle facility outside of the roadway. Tier 2 Bicycle Lanes are those which are more likely to be built by 2035. The NEN is the network of locally-serving streets planned to contain traffic-calming measures that close the gaps between streets containing bicycle facilities.

- Planned Tier 1 facilities in the Project area include Hollywood Boulevard (east of La Brea Avenue).
- Planned Tier 2 facilities in the Project area include segments of Vine Street, Yucca Street, and Franklin Avenue.
- Planned Tier 3 facilities in the Project area include segments of Cahuenga Boulevard.
- Mobility Plan 2035 identifies a proposed Bicycle Path along US-101, east of Bronson Avenue, in the Project area.

The street frontages near the Project Site have a mature network of pedestrian facilities, including sidewalks, crosswalks, and pedestrian safety features such as midblock crossings controlled by signals or stop signs, curb ramps with truncated domes, and high-visibility crosswalks at several intersections. Approximately 8- to 18-foot sidewalks are provided throughout the Project area.



SOURCE: Fehr & Peers, 2020

Hollywood Center Project

Figure IV.L-3
Existing and Proposed Bicycle Facilities

(4) Vision Zero

The following roadways located within the Project vicinity have been identified by the City as part of the HIN:

- Franklin Avenue (between Orchid Avenue and Highland Avenue, between Las Palmas Avenue and Cahuenga Boulevard, and between Beachwood Drive and Gramercy Place)
- Yucca Street (between Cahuenga Boulevard and Argyle Avenue)
- Hollywood Boulevard (throughout the Project area)
- Selma Avenue (between Schrader Boulevard and Vine Street)
- Cahuenga Boulevard (between Franklin Avenue and Yucca Street)
- Ivar Avenue (between Homewood Ave and Sunset Boulevard)
- Vine Street (between Melrose Avenue and Franklin Avenue)

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines and the City's CEQA Transportation Thresholds,[22] a project would have a significant impact related to transportation if it would:

Threshold (a): Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Threshold (b): Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Threshold (c): Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Threshold (d): Result in inadequate emergency access?

In analyzing potential transportation impacts, the City has adopted the thresholds included in its CEQA Transportation Thresholds, which are the same as the impact

22 City of Los Angeles, California Environmental Quality Act (CEQA) Transportation Thresholds, July 2019.

questions included in Appendix G of the CEQA Guidelines. The City's CEQA Transportation Thresholds, along with the TAG, supersede the guidance and factors included the City's 2006 L.A. CEQA Thresholds Guide. The impact criteria in the TAG are discussed below. With regard to emergency access, neither the TAG nor the City's CEQA Transportation Thresholds include specific factors or thresholds for determining potentially significant impacts. The methodology discussed below describes the City's standard considerations when assessing emergency access impacts.

(1) LADOT TAG - Impact Criteria

(a) Programs, Plans, Ordinance, and Plan Consistency

The City has adopted programs, plans, ordinances and policies that establish the transportation planning framework for all travel modes. The overall goals of these policies are to achieve a safe, accessible and sustainable transportation system for all users. Mobility Plan 2035 offers a comprehensive vision and set of policies and programs the City aims to achieve to provide streets that are safe and convenient for all users. Vision Zero Los Angeles aims to reduce transportation fatalities to zero by using extensive crash data analysis to identify priority corridors and intersections and applying safety countermeasures. The TAG indicates that these and other relevant City plans and policies, including new and revised plans that may be adopted over time, be consulted in order to identify potential conflicts with projects and plans in the CEQA review process.

The threshold test is to assess whether a project would conflict with an adopted program, policy, plan, or ordinance addressing the circulation system (including transit, roadways, bicycle, and pedestrian facilities) that is adopted to protect the environment. In general, transportation policies or standards adopted to protect the environment are those that support multimodal transportation options and a reduction in VMT. A project that does not implement a particular program, plan, policy, or ordinance would not necessarily result in a conflict or an impact. Many of these programs must be implemented by the City itself over time and over a broad area, and it is the intention of this threshold test to ensure that proposed development projects and plans do not preclude the City from implementing adopted programs, plans, and policies.

(b) Vehicle Miles Traveled

A development project would have a potential impact if the project meets the following:

- For residential projects, the project would generate household VMT per capita exceeding 15 percent below the existing average household VMT per capita for the Area Planning Commission (APC) area in which the project is located. (see **Table IV.L-2**, *VMT Impact Criteria (15% Below APC Average)*)

TABLE IV.L-2
VMT IMPACT CRITERIA (15% BELOW APC AVERAGE)

Area Planning Commission (APC)	Daily Household VMT Per Capita	Daily Work VMT per Employee
Central	6.0	7.6
East LA	7.2	12.7
Harbor	9.2	12.3
North Valley	9.2	15.0
South LA	6.0	11.6
South Valley	9.4	11.6
West LA	7.4	11.1

SOURCE: LADOT, Transportation Assessment Guidelines, Table 2.2-1, 2019.

- For office projects, the project would generate work VMT per employee exceeding 15 percent below the existing average work VMT per employee for the APC in which the project is located. (see Table 2.2-1 of the TAG)

- For regional serving retail projects, the project would result in an increase in VMT.

- For other land use types, measure VMT impacts for the work trip element using the criterion for office projects above. This criterion was used for the Project with the East Site Hotel Option.

The Project Site is located within the Central APC area, which has a daily household VMT per capita impact criteria of 6.0 and a daily work VMT per employee impact criteria of 7.6.

(c) Geometric Design Feature or Incompatible Use Hazards

Project access plans are reviewed in light of commonly-accepted traffic engineering design standards to ascertain whether any deficiencies are apparent in the site access plans which would be considered significant.[23] The determination of significance shall be on a case-by-case basis, considering the following factors:

- The relative amount of pedestrian activity at Project access points.

- Design features/physical configurations that affect the visibility of pedestrians and bicyclists to drivers entering and exiting the Project Site, and the visibility of cars to pedestrians and bicyclists.

23 One example of traffic engineering design standards includes, but is not limited to Section 321 of LADOT's Manual of Policies and Procedures, which provides guidance on driveway design.

- The type of bicycle facilities the Project driveway(s) crosses and the relative level of utilization.

- The physical conditions of the Project Site and surrounding area, such as curves, slopes, walks, landscaping or other barriers, that could result in vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle impacts.

- The Project location or Project-related changes to the public right-of-way relative to proximity to the HIN or a Safe Routes to School program area.

- Any other conditions, including the approximate location of incompatible uses that would substantially increase a transportation hazard.

b) Methodology

The analysis of potential transportation impacts considers potential Project effects related to: 1) potential conflicts with transportation-related plans, ordinances or policies; 2) a substantial increase in VMT; 3) increased hazards due to a geometric design feature or incompatible use; and 4) emergency access.

The scope of the analysis in the TA was developed in consultation with LADOT. The base assumptions and VMT technical methodologies were identified and agreed to in the LADOT-reviewed and -approved MOU, which is included as Appendix A in the TA. The subsections below describe the methodologies to evaluate each significance threshold.

(1) Review for Conflicts with Plans, Programs, Ordinances, or Policies

As previously stated, the TAG requires Project review for conflicts with transportation-related plans, programs, ordinances, or policies. For projects meeting the screening criteria set forth in Section 2.1-2 of the TAG, the analysis addresses whether the Project would conflict with an adopted program, policy, plan, or ordinance addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities. The focus is on policies or standards adopted to protect the environment and those that support multimodal transportation options and a reduction in VMT. If the Project does not implement a particular program, plan, policy, or ordinance, it would not necessarily result in a conflict as many of these programs must be implemented by the City itself over time, and over a broad area. Rather, the Project would result in a conflict if it would preclude the City from implementing adopted transportation-related programs, plans and policies. Furthermore, if a conflict is identified in association with the Project, under CEQA, it would only equate to a significant impact if precluding implementation of a given

program, plan and policy would foreseeably result in a physical impact on the environment.[24]

Regarding cumulative impacts, each of the plans, ordinances, and policies are reviewed to assess potential conflicts that may result from the Project in combination with other development projects in the Project area. The analysis considers whether there would be a significant impact to the environment to which both the Project and other projects contribute. For instance, a cumulative impact could occur if the Project, as well as other future development projects located on the same block, were to preclude the City's ability to serve transportation user needs as defined by the City's transportation policy framework.

(2) VMT Analysis

Per the TAG, household VMT per capita and work VMT per employee were estimated using the VMT Calculator tool by site (West Site and East Site) for the Project and the Project with the East Site Hotel Option.[25] The VMT Calculator starts with Institute of Transportation Engineers (ITE) Trip Generation, 10th Edition (2017) trip generation rates, but then implements the MXD (mixed-use) methodology from the USEPA and utilizes socioeconomic, transit, and trip length data from the Los Angeles citywide travel demand model, which is calibrated to Los Angeles conditions, to adjust the trips for internalization, transit, and walkability. The VMT Calculator was calibrated based on local count data collected in the City. Further information regarding the methods used by the VMT Calculator to estimate daily trips and daily VMT is provided in the City's VMT Calculator Documentation report.[26]

In order to develop site-wide VMT estimates, the individual estimates for each site were normalized by that site's trip generation and then summed. The VMT Calculator allows for the selection of a wide variety of potential land uses, including the multi-family housing, senior affordable housing, hotel, and restaurant uses proposed as part of the Project. There is not a land use in the VMT Calculator for an outdoor performance space. The most similar option available in the VMT calculator is a movie theater and that use was used in place of the outdoor performance area. Because a movie theater is likely to draw from a larger area

[24] The rule of general plan consistency is that the project must at least be compatible with the objectives and policies of the general plan. (Sequoyah Hills Homeowners Assn. v. City of Oakland (1993) 23 Cal.App.4th 704, 717–718 [29 Cal. Rptr. 2d 182] (Sequoyah Hills).

[25] The Project is located on two blocks that are across from each other along Vine Street. To accurately analyze the Project, the land uses for both the West and East Sites were entered into the appropriate zone in the VMT calculator tool based on address. While entered separately, the results that are presented fully and accurately account for the entire Project's trips, VMT, and per capita VMT estimates.

[26] City of Los Angeles, Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, November 2019.

than a small outdoor space with smaller performances, this provides a more conservative VMT analysis.

The Project VMT impact is considered significant if any one (or all) of the Project land uses exceed the impact criteria identified in the *Thresholds of Significance* subsection above for that particular land use, taking credit for internal capture. In such cases, mitigation options that reduce the VMT generated by any or all of the land uses could be considered.

Local-serving retail development tends to shorten trips and reduce VMT whereas regional-serving retail development can lead to substitution of longer trips for shorter ones and could increase VMT. Local-serving is defined as retail uses less than 50,000 square feet.[27] Since the Project's retail uses are less than 50,000 square feet, for both the Project and the Project with the East Site Hotel Option, the retail/restaurant components of the Project are, therefore, considered to be local serving and those portions of the Project are considered to not have a significant VMT impact. This criterion was used for the restaurant component of the Project.

For mixed-use projects, each component is evaluated separately and the impact criteria above are applied for each relevant individual land use. Each individual criterion was used for the Project.

A Transportation Demand Management (TDM) Program consists of strategies that are aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking. Strategies included in a typical TDM Program address a wide range of transportation factors, including parking, transit, commute trips, shared mobility, bicycle infrastructure, site design, education and encouragement, and management. The Project is committing to implementing a variety of TDM strategies as a Project Design Feature (PDF) (see Project Design Feature TRAF-PDF-1 below). The Project will be conditioned to include these TDM strategies as a requirement for approval of Project entitlements and the Project's Mitigation Monitoring Program (MMP) will include the PDF to further ensure it is implemented by the Project. These strategies were included as part of the VMT analysis.

TDM reductions for the Project were estimated based on the California Air Pollution Control Officers Association (CAPCOA) research and methodologies as described in Quantifying Greenhouse Gas Mitigation Measures.[28] Residential, senior affordable residential, and commercial land use TDM credits are calculated separately, as certain TDM measures are more appropriately employed for commercial or residential land uses. For example, for commercial tenants,

[27] City of Los Angeles Department of Transportation (LADOT), Transportation Assessment Guidelines, July 2019, p. 19, Footnote 14.

[28] California Air Pollution Control Officers Association (CAPCOA), Quantifying Greenhouse Gas Mitigation Measures, August 2010.

vanpools and rideshare may be effective tools to reduce employee solo vehicle trips. However, vanpools would be difficult to implement for residents who are traveling from the Project to many disparate destinations. For residents, unbundling parking is more effective because residents are incentivized to reduce car ownership to save on condominium unit purchase price or monthly rental costs for a vehicular parking space. Additionally, the net effectiveness of commute trip reductions is reduced for the commercial land uses as those measures are only applicable to the work trips made by commercial land use employees, rather than the trips made by the commercial patrons.

The cumulative analysis considers both short- and long-term Project effects on VMT. Short-term effects are evaluated in the detailed Project-level VMT analysis described above. Cumulative effects are determined through a consistency check with the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The 2016-2040 RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and GHG reduction targets. As such, projects that are consistent with this plan in terms of development location, density, and intensity, are part of the regional solution for meeting air pollution and GHG goals. Projects that are deemed to be consistent would have a less-than-significant cumulative impact on VMT. Development in a location where the 2016-2040 RTP/SCS does not specify any development may indicate a significant impact on transportation. As the Project Site is in a location where the 2016-2040 RTP/SCS includes development, this does not apply to the Project. However, for projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e., VMT per capita or VMT per employee) in the project impact analysis, a less- than- significant project impact conclusion is sufficient in demonstrating there is no cumulative VMT impact. Projects that fall under the City's efficiency-based impact thresholds are already shown to align with the long-term VMT and greenhouse gas reduction goals of SCAG's 2016-2040 RTP/SCS.

Projects that both demonstrate a project impact by applying an efficiency-based VMT threshold and that are not deemed to be consistent with the 2016-2040 RTP/SCS could have a significant cumulative impact on VMT. Further evaluation would be necessary to determine whether such a project's cumulative impact on VMT is significant. This analysis could be conducted by running the City's Travel Demand Forecasting model with the cumulative "no project" scenario representing the adopted 2016-2040 RTP/SCS cumulative year conditions (as incorporated into the City's model) and the cumulative "plus project" scenario representing the reallocation of the population and/or employment growth based on the land supply changes associated with the Project. Citywide VMT, household VMT per capita, or work VMT per employee (depending on project type) would be calculated for both scenarios, and any increase in VMT, household VMT per capita, or work VMT per employee (depending on project type) above that which was forecast in the

adopted 2016-2040 RTP/SCS would constitute a significant impact because it could jeopardize regional air quality conformity or GHG reduction findings.

(3) Geometric Design Feature or Incompatible Use Hazards

For vehicle, bicycle and pedestrian safety impacts, a review is conducted for all Project access points, internal circulation, and parking access from an operational and safety perspective (e.g., turning radii, driveway queuing, line-of-sight for turns into and out of project driveway[s]). Where Project driveways would cross pedestrian facilities or bicycle facilities (bike lanes or bike paths), the analysis considers operational and safety issues related to the potential for vehicle/pedestrian and vehicle/bicycle conflicts and the severity of consequences that could result.

(4) Emergency Access

For emergency access impacts, a review is conducted for Project access points, internal circulation, and parking access to determine if adequate emergency access is provided. The analysis considers the physical conditions of the Project Site and surrounding area, such as curves, slopes, walls, landscaping or other barriers. Also, a determination is made as to whether the Project would preclude adequate emergency access within the adjacent roadway network.

c) Project Design Features

The following Project Design Features are applicable to the Project.

TRAF-PDF-1: Transportation Demand Management (TDM) Program. The Applicant will implement a TDM Program aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking. The TDM Program will be subject to review and approval by the Los Angeles Department of City Planning and LADOT. The exact measures to be implemented will be determined when the Program is prepared, prior to issuance of a final certificate of occupancy for the Project. The strategies in the TDM Program will include, but are not necessarily limited to:

<u>Parking</u>

- Unbundle residential parking and price according to market rate
- Unbundle commercial parking coupled with pricing workplace parking and parking cash-out
- Contribute to LADOT Express Park program to upgrade local parking meter technology
- Daily parking discount for Metro Commuters

Transit

- Provide a location on-site at which to purchase Metro passes and display bus information
- Transit subsidies (available to residents and commercial employees) up to 50 percent of the cost of a monthly pass
- Provide parking spaces for monthly lease to non-resident Metro park-and-ride users
- Provide discounted daily parking to non-resident Metro transit pass holders
- Immediately adjacent Metro bus stop upgrades, which could include, but not limited to, street furniture, signage, and/or other transit-related information

Commute Trip Reductions

- Commute trip reduction program:
  - Rideshare (carpool/vanpool) matching and preferential parking
  - Guaranteed ride home (e.g., monthly Uber/Lyft/taxi reimbursement)
  - Encourage alternative work schedules and telecommuting for project residents
- Business center/work center for residents working at home

Shared Mobility

- On-site car share
- Rideshare matching
- On-site bike share station with subsidized or free membership (residents, employees); on-site guest bike share service (hotel) (if/when public bike share comes to Hollywood)
- Coordination with LADOT Mobility Hub program

Bicycle Infrastructure

- Develop a bicycle amenities plan
- Bicycle parking (indoors and outdoors)
- Bike lockers, showers, and repair station
- Convenient access to on-site bicycle facilities (e.g., wayfinding, etc.)
- Contribution towards City's Bicycle Plan Trust Fund

Site Design

- Integrated pedestrian network within and adjacent to site (e.g., transit-, bike-, pedestrian-friendly)
- External and internal multimodal wayfinding signage

Education & Encouragement

- Transportation information center, kiosks and/or other on-site measures, such as providing a Tenant Welcome Package (i.e., all new residents receive information on available alternative modes and ways to access destinations)
- Tech-enabled mobility: incorporating commute planning, on-demand rideshare matching, shared-ride reservations, real-time traffic/transit information, push notifications about transportation choices, interactive transit screens, etc.
- Marketing and promotions (including digital gamification – participants can log trips for prizes, promotions, discounts for local merchants, incentives, etc.)

Management

- On-site TDM Program coordinator and administrative support
- Conduct user surveys
- Join future Hollywood Transportation Management Organization (TMO)

TRAF-PDF-2: Construction Traffic Management Plan. Prior to the issuance of a building permit for the Project, a detailed Construction Management Plan (CMP), including street closure information, a detour plan, haul routes, and a staging plan, will be prepared and submitted to the City for review and approval. The CMP will formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The CMP will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site. Construction management meetings with City Staff and other surrounding construction-related project representatives (i.e., construction contractors), whose projects will potentially be under construction at around the same time as the Project, will be conducted bimonthly, or as otherwise determined appropriate by City Staff. This coordination will ensure construction activities of the concurrent related projects and associated hauling activities are managed in collaboration with one another and the Project. The CMP will include, but not be limited to, the following elements as appropriate:

- As traffic lane, parking lane and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles, will be developed and implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures.
- Ensure that access will remain unobstructed for land uses in proximity to the Project Site during project construction.
- Coordinate with the City and emergency service providers to ensure adequate access, including emergency access, is maintained to the Project Site and neighboring businesses and residences. Emergency access points will be marked accordingly in consultation with LAFD, as necessary.
- Provide off-site truck staging in a legal area furnished by the construction truck contractor. Anticipated truck access to the Project Site will be off Ivar Avenue, Vine Street, and Argyle Avenue.
- Schedule deliveries and pick-ups of construction materials during non-peak travel periods to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods.
- As parking lane and/or travel lane closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles, should be implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures.

TRAF-PDF-3: Construction Worker Parking Plan. The Applicant will prepare a Construction Worker Parking Plan prior to commencement of construction to identify and enforce parking location requirements for construction workers. The Construction Worker Parking Plan will include, but not be limited to, the following elements as appropriate:

- During construction activities when construction worker parking cannot be accommodated on the Project Site, the plan will identify alternate parking location(s) for construction workers and the method of transportation to and from the Project Site (if beyond walking distance) for approval by the City 30 days prior to commencement of construction.
- Construction workers will not be permitted to park on street.
- All construction contractors will be provided with written information on where their workers and their subcontractors are permitted to park and provide clear consequences to violators for failure to follow these regulations.

d) Analysis of Project Impacts

Threshold (a): Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

The Project and the Project with the East Site Hotel Option would include the same access, circulation and supporting alternative transportation features (i.e., pedestrian and bicycle features). Accordingly, impacts under Threshold (a) would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

(1) Impact Analysis

The TAG Guidelines, Table 2.1-1, *City Documents that Establish Regulatory Framework*, includes a list of City plans, policies, programs, ordinances and standards that should be consulted to help identify potential conflicts with projects undergoing CEQA review. Also, Table 2.1-2, *Questions to Determine Project Applicability to Plans, Policies and Programs*, of the TAG includes screening questions for determining Project applicability to relevant plans, policies, and programs, in order to assess whether the Project would preclude their implementation. The questions and responses to each screening question in Table 2.1-2 of the TAG is included in Appendix C of the TA. Upon review of Table 2.1-1 and the responses to Table 2.1-2 provided in the TA, the following plans, policies, programs were determined relevant to the Project and are analyzed in this EIR section: Mobility Plan 2035, Hollywood Community Plan, Hollywood Redevelopment Plan, LADOT MPP, Vision Zero, LAMC (various sections), Plan for a Healthy Los Angeles, Citywide Design Guidelines, Mobility Hub Guide, and Walkability Checklist and the TOC Guidelines. Based on the review, it was determined that there are no applicable Specific Plans since the Project Site is not located within an area governed by a Specific Plan. In addition, there are no streetscape plans near the Project Site, and the general recommendations in LADOT's Transportation Technology Strategy – Urban Mobility in a Digital Age are not directly relevant to the Project.

The analysis below includes a consistency analysis with the plans, policies and programs determined to be applicable to the Project.

(a) Mobility Plan 2035

Mobility Plan 2035 includes numerous policies and programs that are applicable to development associated with the Project. **Table IV.L-3**, *Consistency of the Project With Applicable Policies and Programs of Mobility Plan 2035*, provides

determinations of whether the Project would conflict with any of the applicable policies and programs in Mobility Plan 2035. As shown therein, the Project would not conflict with any of the applicable policies and programs.

TABLE IV.L-3
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES AND PROGRAMS OF MOBILITY PLAN 2035

Policy/Issue/Program	Would the Project Conflict?
2.1 – Adaptive Reuse of Streets. Design, plan, and operate streets to serve multiple purposes and provide flexibility in design to adapt to future demands.	**No Conflict.** Streetscape, landscape and lighting improvements proposed by the Project would enhance pedestrian activity and walkability in and around the Project Site, supporting various street functions related to mobility, economic vitality, sustainability, and social interaction. The Project also proposes a paseo that would connect Ivar Avenue, Vine Street, and Argyle Avenue and offer social gathering spaces. These Project improvements would not alter adjacent streets or the right-of-way in a manner that would preclude or conflict with potential future changes or the adaptive reuse of adjacent streets.
2.3 – Pedestrian Infrastructure. Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.	**No Conflict.** A pedestrian paseo and a proposed signalized crossing across Argyle Avenue are intended to facilitate pedestrian connectivity and align with existing mid-block crosswalks on Vine Street and Ivar Avenue. The Project does not propose to narrow sidewalks or remove streetscape amenities or features. The Project's pedestrian features would integrate into and with the adjacent pedestrian network to maintain connections with multimodal facilities. Furthermore, the Project has been specifically designed to avoid disruption to the Hollywood Walk of Fame by eliminating driveway and vehicular access from Vine Street, including the removal of seven existing curb cuts. These changes would help restore continuity to the Hollywood Walk of Fame while reducing vehicle/pedestrian conflicts.

TABLE IV.L-3
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES AND PROGRAMS OF MOBILITY PLAN 2035

Policy/Issue/Program	Would the Project Conflict?
2.4 – Neighborhood Enhanced Network. Provide a slow speed network of locally serving streets.	**No Conflict.** Segments of Cahuenga Boulevard, Argyle Avenue, Yucca Street, Gower Street, and Carlos Avenue are part of the City's NEN. These are streets that can provide comfortable and safe routes for slower modes such as walking, bicycling, and other means of travel. Enhancements on these streets are intended to provide a more comfortable experience for users of slow modes by achieving target vehicle speeds and volumes that complement slower modes of travel. The Project is not proposing any changes along these streets that would prevent the City from installing additional features as part of the NEN or modifications to these streets in a way that would substantially increase travel speeds on these roadways.
2.5 – Improve the performance and reliability of existing and future bus service.	**No Conflict.** The Project does not propose to remove or modify transit facilities in a manner that would negatively impact the reliability of existing or future bus service. Also, the Project would not preclude or limit the City from implementation of the TEN on locally designated corridors.
2.6 – Bicycle Networks. Provide safe, convenient, and comfortable local and regional bicycling facilities[29] for people of all types and abilities.	**No Conflict.** Consistent with LAMC Section 12.21 A.16, the Project would provide up to 551 bicycle parking spaces (or 554 bicycle spaces under the project with the Project with the East Site Hotel Option), as well as bike lockers and showers located in the subterranean bike parking areas in dedicated areas on the respective sites. A bicycle repair facility would also be provided on the Project Site as part of the amenities to increase access for bicycle users. Bicyclists would have the same access opportunities to the Project Site as pedestrians. Further, Vine Street and Yucca Street (east of Vine Street) are designated as Tier 2 bicycle facilities. Project development would not preclude development of bike lanes along these streets, and thus, the Project would not conflict with the bicycle lane network envisioned in Mobility Plan 2035.

[29] Bicycling facilities are ideally suited for a host of slow moving modes, including, but not limited to, scooters, skateboards, rollerblading, rideables (e.g., electric-powered skateboards, scooters, hoverboards, and bikes), and other future compact personal transportation technologies.

TABLE IV.L-3
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES AND PROGRAMS OF MOBILITY PLAN 2035

Policy/Issue/Program	Would the Project Conflict?
2.7 – Vehicle Network. Provide vehicular access to the regional freeway system.	**No Conflict.** All existing roadways adjacent to the Project Site, including Yucca Street, Argyle Avenue, Ivar Avenue and Vine Street would continue to provide access to the regional freeway system, particularly US-101 located approximately 380 feet north of the Project Site, similar to existing conditions. The Project would also not conflict with the street designations and classifications for the adjacent roadways as identified in Mobility Plan 2035. Adjacent streets will retain their designation, including Vine Street with the installation of the landscaped median.
2.10 – Loading Areas. Facilitate the provision of adequate on and off-site street loading areas.	**No Conflict.** The West Site would have a designated commercial loading area off a separate driveway from Ivar Avenue, while the East Site would have a commercial loading area accessed from Argyle Avenue. As such, the Project would provide adequate loading areas.
3.2 – People with Disabilities. Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.	**No Conflict.** Modifications to the public right-of-way are required to provide ADA accommodations for accessibility. The Project would enhance east-west connectivity by providing a signalized marked crossing with a curb cut to facilitate access across Argyle Avenue that aligns with the proposed paseos and existing marked midblock crossings on Vine Street and Ivar Avenue. The Project would not inhibit sidewalk areas or create any obstructions to limit or inconvenience the mobility of travelers with disabilities along the public right-of-way.
3.5 - Multi-Modal Features. Support "first-mile, last-mile solutions" such as multi-modal transportation services, organizations, and activities in the areas around transit stations and major bus stops (transit stops) to maximize multi-modal connectivity and access for transit riders.	**No Conflict.** The Project would implement a TDM Program per TRAF-PDF-1. As part of the TDM, the Project would support strategies to encourage public transit, such as providing on-site locations to purchase Metro passes, transit subsidies, a commute trip reduction program; shared mobility features (i.e., bike and car share); education and encouragement programs on available transit options; and on-site management of TDM programs. Also, the Project would include bike parking on both the West Site and East Site that meets LAMC requirements. Bicycle maintenance and shower areas would also be provided in the B2 level of the West Site and in the B5 Level of the East Site. A bicycle repair facility would also be provided on the Project Site. Streetscape,

TABLE IV.L-3
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES AND PROGRAMS OF MOBILITY PLAN 2035

Policy/Issue/Program	Would the Project Conflict?
	landscape and lighting improvements would enhance pedestrian activity and walkability in and around the Project Site. A pedestrian paseo and a proposed signalized crossing across Argyle Avenue are intended to facilitate pedestrian connectivity and align with existing mid-block crosswalks on Vine Street and Ivar Avenue. These Project improvements and programs would improve first/last mile access and encourage use of nearby transit, including the Metro Red Line.
3.8 – Bicycle Parking, Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.	**No Conflict.** The Project would provide on-site bicycle lockers and a bicycle repair facility, as well as parking consistent with the City's Bicycle Parking Ordinance. Refer also to response to Policy 3.5, above. The Project would provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.
3.9 – Increased Network Access. Discourage the vacation of public rights-of-way.	**No Conflict.** This policy focuses on maintaining network access through strategies, such as smaller block sizes to facilitate connectivity for travelers in the area. This policy discourages the vacation of public rights-of-way on the basis that these types of changes may limit connectivity by increasing block sizes and removing previously accessible travel routes for multimodal activity. The public alley on the East Site would provide east-west access from Argyle Avenue to Vine Street and currently lacks sidewalks or infrastructure that serves multi-modal connections. The Project would include a landscaped pedestrian paseo that would connect Argyle Avenue and Vine Street via the Project Site, within approximately 100 feet of the existing alley. Thus, while the Project is proposing partial vacation of the public alley, the Project would include design features to provide an enhanced east-west connection, thus not conflicting with the intent of this policy to increase network access. Generally, the Project would create enhanced connections by connecting Ivar Avenue, Vine Street, and Argyle Avenue through a pedestrian paseo and marked midblock crossings. Currently doing this requires traversing private parking lots, while the Project design would create and enhance this connection through the proposed site design.

TABLE IV.L-3
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES AND PROGRAMS OF MOBILITY PLAN 2035

Policy/Issue/Program	Would the Project Conflict?
4.8 – Transportation Demand Management Strategies. Encourage greater utilization of Transportation Demand Management Strategies to reduce dependence on single-occupancy vehicles.	**No Conflict.** The Project has committed to implement numerous TDM measures that are included as part of Project Design Feature TRAF-PDF-1. As part of the TDM Program, the Project would support strategies to encourage public transit such as providing unbundled parking, on-site locations to purchase Metro passes, transit subsidies, a commute trip reduction program; shared mobility features (i.e., bike and car share); bicycle friendly infrastructure, education and encouragement programs on available transit options; and on-site management of TDM programs. The TDM Program measures are aimed at discouraging single-occupancy vehicle trips and would collectively serve to reduce dependence on single-occupancy vehicles.
4.13 – Parking and Land Use Management. Balance on-street and off-street parking supply with other transportation and land use objectives.	**No Conflict.** The Project's parking would primarily be provided within subterranean levels and, as such, would not detract from the neighborhood's visual quality. As such, the Project's parking would not undermine any potential vibrant public open spaces. Further, parking would not be free so as to discourage automobile trips and make alternative modes of transportation more attractive. As such, the Project would balance parking supply with other transportation and land use objectives.
5.1 – Sustainable Transportation. Encourage the development of a sustainable transportation system that promotes environmental and public health.	**No Conflict.** The Project's mix of uses would allow residents, employees, and visitors/patrons to make transportation choices that are more environmentally sustainable and promote public health by providing convenient access to walking, biking and transit options in and around the Project Site. A pedestrian paseo and a proposed signalized crossing across Argyle Avenue are intended to facilitate pedestrian connectivity and align with existing mid-block crosswalks on Vine Street and Ivar Avenue. These improvements would improve first/last mile access to nearby transit, including the Metro Red Line. The Project also would provide up to 551 bicycle parking spaces (or 554 bicycle spaces under the project with the Project with the East Site Hotel Option), as well as bike lockers and showers located in the subterranean bike parking areas in dedicated areas on the respective sites. A bicycle repair

TABLE IV.L-3
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES AND PROGRAMS OF MOBILITY PLAN 2035

Policy/Issue/Program	Would the Project Conflict?
	facility would also be provided on the Project Site as part of the amenities to increase access for bicycle users. Overall, the Project's features would encourage a sustainable transportation system that promotes environmental and public health.
5.2 – Vehicle Miles Traveled. Support ways to reduce VMT per capita.	**No Conflict.** The Project has committed to implement numerous TDM measures that are included as part of Project Design Feature TRAF-PDF-1. As part of the TDM, the Project would support strategies to encourage public transit, such as providing unbundled parking, on-site locations to purchase Metro passes, transit subsidies, a commute trip reduction program; shared mobility features (i.e., bike and car share); bicycle friendly infrastructure, education and encouragement programs on available transit options; and on-site management of TDM programs. These TDM measures would collectively serve to reduce VMT per capita. As discussed under Threshold (b), the Project's VMT per capita would be below the VMT thresholds of significance for the Central APC.
5.4 – Clean Fuels and Vehicles. Continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.	**No Conflict.** The Project would encourage the use of electric vehicles by providing parking spaces capable of supporting electric vehicle supply equipment as required in Project Design Feature GHG-PDF-1 for a minimum of 30 percent of the provided parking spaces, with 10 percent of the provided spaces further improved with electric vehicle charging stations. As such, the Project would support the use of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.
Street Designations/Classifications & Standard Roadway Dimensions. Map A4 – Central Mid-City Subarea, Citywide General Plan Circulation System.	**No Conflict.** Mobility Plan 2035 street standards were reviewed by Fehr & Peers (traffic consultant) as part of the TA and compared to existing and future conditions resulting from the Project and it was determined that the Project would not conflict with street designations and classifications therein. No street widenings would be necessary with the Project. No dedications or improvements are required along Project frontages as the rights-of-way and roadway configurations are consistent and/or do not preclude the cross-sections and designations in Mobility Plan 2035.

TABLE IV.L-3
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES AND PROGRAMS OF MOBILITY PLAN 2035

Policy/Issue/Program	Would the Project Conflict?
Program PL.1 - Driveway Access. Require driveway access to buildings from non-arterial streets or alleys (where feasible) in order to minimize interference with pedestrian access and vehicular movement.	The Project would be consistent with this program as driveways would be located on Ivar Avenue, Yucca Street, and Argyle Avenue (all local streets), while avoiding Vine Street.
Program PS.3 - Pedestrian Loops. Explore the development of a connected network of walking passageways utilizing both public and private spaces, local streets and alleyways to facilitate circulation.	The Project would be consistent with this program and aid in providing a walkable pedestrian loop by providing a pedestrian paseo connecting Ivar Avenue, Vine Street, and Argyle Avenue and marked midblock crossings. This connection would enhance pedestrian connectivity to other public spaces, such as sidewalks, for pedestrian connectivity.
Program PK.7 - Off-Street Loading. In non-industrial areas, require off-street dock and/or loading facilities for all new non-residential buildings and for existing non-residential buildings and undergoing extensive renovations and/or expansion, whenever practical.	The Project includes off-street loading areas for commercial loading and back-of-house functions. Additionally, the Project provides areas for off-street loading that would also accommodate visitors and rideshare services. Off-street access to these areas is provided for the West Site from Ivar Avenue, and for the East Site from Argyle Avenue.

SOURCE: ESA, 2020.

Under both the Project and the Project with the East Site Hotel Option, streets adjacent to the Project Site are and would continue to be compliant with street cross-sections and designations in Mobility Plan 2035. Designated passenger drop-off areas would be provided to allow for convenient access to rideshare options. A pedestrian paseo and a proposed signalized crossing across Argyle Avenue are intended to facilitate pedestrian connectivity and align with existing mid-block crosswalks on Vine Street and Ivar Avenue. The paseo would offer contiguous pedestrian access to all buildings and public spaces through the Project Site from west to east. The Project does not propose to narrow sidewalks or remove streetscape amenities or features.

The locations of driveways are intended to minimize disruptions to the pedestrian right-of-way and would result in a reduction in the number of curb cuts from 12 to 5. The Project would remove all existing driveways on Vine Street, and no driveways are proposed on Vine Street to help preserve the Hollywood Walk of Fame and to locate vehicular access on streets that have existing driveways. Also, no new driveways are proposed along Yucca Street (one existing driveway to

remain on Yucca Street east of Vine Street). Yucca Street, west of Vine Street, and Vine Street are both within a PED and designated for Tier 2 bicycle lanes within the City's BLN. With no new driveways along either of these street frontages, the removal of one existing curb cut along Yucca Street on the West Site, and the removal of five existing curb cuts along Vine Street, the Project would promote pedestrian circulation and safety along these streets within a PED. Also, no conflicts would occur with bicycle facilities identified as part of the BLN on these streets. Argyle Avenue adjacent to the Project Site is identified as being part of the PED and NEN. With the pedestrian paseo being available from Argyle and a new crosswalk along Argyle Avenue near the paseo, in addition to street trees and a new sidewalk, the Project would support pedestrian movement along Argyle as part of a PED. Being part of the NEN, Argyle Avenue should provide a comfortable and safe route for slower modes such as walking, bicycling, and other means of travel. The Project is proposing a signalized, four-way intersection at Argyle Avenue and Carlos Avenue, which would include a crosswalk across Argyle Avenue. This Project feature would slow down vehicle speeds along Argyle supporting safer modes of travel (i.e., pedestrian and bicycle). Otherwise, the Project is not proposing any changes along Argyle Avenue that would prevent the City from installing additional features as part of the NEN, nor does the Project propose to modify Argyle Avenue in a way that would substantially increase travel speeds on this roadway. Further, Project access locations would be designed to comply with City standards so as to provide adequate sight distance and pedestrian movement controls that would meet the City's requirements to protect pedestrian safety.

Overall, the Project design and its features supporting multimodal transportation would not conflict with transportation policies, standards, or programs in Mobility Plan 2035 adopted to protect the environment and reduce VMT.

(b) Hollywood Community Plan

The 1988 Hollywood Community Plan's Objective 6 relates to the provision of a circulation system coordinated with land uses and densities and adequate to accommodate traffic and encouragement of the expansion and improvement of public transportation service. The Project would increase population density in close proximity to the Metro Red Line Hollywood/Vine Station, other regional Metro bus lines, and the LADOT DASH lines. Furthermore, the Project would include bicycle parking spaces, bike lockers, and showers for Project residents, employees, and visitors. The Project also proposes road and pedestrian improvements, including providing a paseo linking the West Site and East Site and new median and crossing improvements along Vine Street, which would increase pedestrian safety by enhancing the crossing with larger high-visibility crosswalk striping that includes a landscaped median and is controlled by a signal. The crossing upgrades would make the crossing more visible and able to serve a larger number of pedestrians within the crosswalk. A signalized mid-block crosswalk is proposed across Argyle Avenue to help facilitate local pedestrian circulation and

access by maintaining a path of east-west travel with the existing mid-block crosswalks across Ivar Avenue and Vine Street. This signal would also control the intersection of Argyle Avenue with Carlos Avenue and a Project driveway. Accordingly, the Project would not conflict with the Hollywood Community Plan's applicable circulation system objective.

(c) Hollywood Redevelopment Plan

Consistent with the Hollywood Redevelopment Plan's goal of improving and supporting pedestrian, automobile, parking and mass transit systems, the Project would improve pedestrian access in and around the Project Site, as discussed above. The Project's increase in density on the Project Site near available mass transit would be supportive of the Redevelopment Plan's goals to meet future transportation needs. Consistent with the Redevelopment Plan, all existing parking removed from the Project Site would be replaced as part of the Project. Further, the Project's TDM Program includes parking, transit, and various other strategies to encourage alternative transportation and reduce commuter trips, all of which are consistent with the Hollywood Redevelopment Plan transportation goals. The Project would not conflict with the applicable goals of the Hollywood Redevelopment Plan.

(d) LADOT Manual of Policies and Procedures

The LADOT MPP, Section 321, Driveway Design, includes driveway design standards to minimize adverse effects on street traffic. The Project includes property at the southeast corner of Ivar Avenue and Yucca Street and the southeast corner of Vine Street and Yucca Street. The southeast corner of Vine Street and Yucca Street would not be changed, and the Gogerty Building would remain, screening parking and providing windows and doors at the ground level, and preserving the Hollywood Walk of Fame along the segment of Vine Street immediately adjacent to the Project Site. The southeast corner of Ivar Avenue and Yucca Street would include a restaurant and lobby for the West Senior Building. A service access driveway is proposed approximately 150 feet from the corner of Yucca Street and Ivar Avenue. MPP 321 on the design of driveways states that on a collector or local street, such as Ivar Avenue, driveways should not be placed within 75 feet of the adjacent street (for a project with frontage greater than 250 feet). The Project would comply with this requirement so as to not adversely affect traffic at the nearby Ivar and Yucca intersection. The Project would not conflict with the LADOT MPP.

(e) Vision Zero

Vision Zero is a plan that strives to eliminate traffic-related deaths in Los Angeles by 2025 through strategies, such as modifying streets to better serve vulnerable road users. Projects located in the HIN should make improvements or fund them. Yucca Street (between Ivar Avenue and Argyle Avenue), Ivar Avenue (at the intersection of Ivar Avenue and Yucca Street), and Vine Street (between Yucca

Street and Hollywood Boulevard) are identified as streets within the HIN. As indicated above, no new driveways are proposed along Vine Street; rather, five existing curb cuts along Vine Street would be removed. Also, no new driveways are proposed along Yucca Street (1 existing driveway to remain on Yucca Street east of Vine Street). No specific HIN projects have been identified for Yucca Street or Vine Street. The Project would not preclude or conflict with the implementation of future Vision Zero projects in the public right-of-way along these streets.

(f) Los Angeles Municipal Code

Consistent with LAMC Section 12.21 A.16, the Project would provide up to 551 bicycle parking spaces (or up to 554 spaces in the Project with the East Site Hotel Option), bike lockers, and showers. The Project would encourage bicycle use to and from the Project Site by providing long-term and short-term bicycle parking in proximity to existing bicycle facilities along Wilcox Avenue, Vine Street, Orange Drive, Willoughby Avenue, Selma Avenue, Argyle Avenue, Fountain Avenue, Heliotrope Drive, and Yucca Street, as well as future planned protected bicycle lanes within the vicinity of the Project. The Project's location and design would provide new residential population, visitors, and employees with access to restaurant, retail, recreation, and entertainment activities within walking and biking distances and would provide convenient access to bus and rail services.

LAMC Section 12.37 includes highway and collector street dedication and improvement requirements for certain lots where the one-half of the highway or collector street which is located on the same side of the center of the highway or collector street has not been dedicated and improved for the full width of the lot so as to meet the standards for such highway or collector street. Based on review of LAMC Section 12.37 by the traffic consultant (Fehr & Peers) as part of the TA,[30] no dedication is required as adjacent highways and collectors are compliant with the widths and/or cross-sections as shown in Mobility Plan 2035. Thus, the Project would not conflict with applicable LAMC sections.

(g) Plan for a Healthy Los Angeles

The Project would support Policy 2.10, Social Connectedness, of the Plan for a Healthy Los Angeles through its inclusion of the proposed paseo that would feature shopping, outdoor seating, landscaping, open-air dining, public performances, art installations, and special events, all of which promote social connectedness. The Project would also support Policy 5.7, Land Use Planning for Public Health and Greenhouse Gas (GHG) Emission Reduction, by reducing single-occupant vehicle trips by virtue of its location within proximity to abundant high-quality and high-frequency transit options. In addition, TRAF-PDF1 includes a TDM program as part of the Project. The Project would not interfere with other policies recommended by

30 Refer to Appendix B in the Transportation Assessment for the Hollywood Center Project (TA), provided in Appendix N-1 of this Draft EIR.

the plan. Therefore, the Project would not conflict with the Plan for a Healthy Los Angeles.

(h) Citywide Design Guidelines

Guideline 2 of the Citywide Design Guidelines recommends incorporating vehicle access such that it does not discourage and/or inhibit the pedestrian experience. Specifically, Guideline 2 calls for prioritizing pedestrian access first and automobile access second; orienting parking and driveways toward the rear or side of buildings and away from the public right-of-way; and on corner lots, orienting parking as from the corner as possible. The Project's driveway locations are intended to minimize disruptions to the pedestrian right-of-way and would result in a reduction in the number of curb cuts from 12 to five. No driveways are proposed on Vine Street and existing curb cuts on Vine Street would be eliminated to avoid impacts to and enhance pedestrian continuity along the Hollywood Walk of Fame, and to locate vehicular access on streets that have existing driveways. All new parking would be enclosed within the Project Site. The West Site includes new development at the southeast corner of Ivar Street and Yucca Street. The Project would promote the safety and comfort of pedestrians by activating ground-level frontages with street-level restaurant space at the corner of Ivar Avenue and Yucca Street on the West Site. No driveways are proposed along Yucca as part of the West Site. Access to the West Site would be provided via two driveways on Ivar Avenue, as described below. Access to the trash receptacles, the loading zone, and back of house areas would be accessed from the northern driveway located on Ivar Avenue, south of Yucca Street. Access to all levels of the parking garage would be provided from the southern Ivar Avenue driveway. Project driveways would be located a sufficient distance from the intersection of Yucca Street and Ivar Avenue to ensure safe operation. These components of the Project ensure that the Project would comply with the Design Guidelines' recommendations regarding the pedestrian experience and would incorporate amenities that promote social connection. Therefore, the Project would not conflict with the Citywide Design Guidelines.

(i) Mobility Hubs Reader's Guide

The Mobility Hubs Reader's Guide specifically focuses on enhancing bicycle connections, providing vehicle sharing services, improving bus infrastructure, providing real-time transit and wayfinding information, and enhancing walkability and pedestrian connections. The Project would incorporate several components, including LAMC-required short-term and long-term bicycle parking that both facilitates and encourages bicycling in and around the Project that support alternate modes of transportation. Additionally, the Project would provide active uses that support a vibrant and mixed-use environment, including street-facing restaurant uses. Further, as part of the Project's TDM Program, the Project would support strategies to encourage public transit such as providing on-site locations to purchase Metro passes, transit subsidies, a commute trip reduction program;

shared mobility features (i.e., bike and car share); education and encouragement programs on available transit options; and on-site management of TDM programs. The Project would not conflict with the Mobility Hubs Reader's Guide.

(j) Walkability Checklist

The Project would result in the retention of all sidewalks and new pedestrian crosswalks adjacent to the Project Site. The Project would enhance the pedestrian experience with its new pedestrian paseo and would promote the safety and comfort of pedestrians with the location of ground level commercial uses, which would serve to activate the Project Site's street frontages. The Project would also eliminate existing curb cuts on Vine Street, with the effect of reducing vehicle conflicts and interference with pedestrian activity along the Hollywood Walk of Fame. These features support the Walkability Checklist recommendations and serve to enhance the pedestrian experience. The Project would not conflict with the Walkability Checklist.

Based on the above, the Project and the Project with the East Site Hotel Option would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, which have been adopted to protect the environment and reduce VMT. Therefore, impacts would be less than significant.

(2) Mitigation Measures

Impacts regarding the Project's consistency with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding the Project's consistency with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities would be less than significant. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (b): Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

There is a difference in VMT between the Project and the Project with the East Site Hotel Option; therefore, separate VMT calculations and analyses are provided for the impact analysis under this threshold. However, the conclusions regarding the impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

(1) Impact Analysis

As explained in *Methodology*, above, the City's VMT Calculator was used to determine the Project's VMT per capita based on Project characteristics, such as land uses, land use quantities, and TDM measures that are included as part of the Project (see Project Design Feature TRAF-PDF-1).

(a) Project Household and Work VMT

As estimated by the VMT Calculator, the Project would generate 4.8 household VMT per capita, which is below the threshold of significance for the Central APC of 6.0 household VMT per capita. The VMT Calculator outputs and additional details regarding the analysis are provided in Appendix N-1 of this Draft EIR.

As previously indicated, the Project is exempt from evaluation of the retail VMT because the retail component is less than 50,000 square feet and considered local serving. Thus, no further analysis is necessary.

(b) Project with the East Site Hotel Option Household and Work VMT

As estimated by the VMT Calculator, the Project with the East Site Hotel Option would generate 4.7 household VMT per capita, which is below the threshold of significance for the Central APC of 6.0 household VMT per capita. The VMT Calculator outputs and additional details regarding the analysis are provided in Appendix N-1 of this Draft EIR.

As indicated above, the Project is exempt from evaluation of the retail VMT because the retail component is less than 50,000 square feet and considered local serving. However, the work VMT calculation is relevant to the Project with the East Site Hotel Option and is estimated as 4.8 work VMT per employee, which is below the City's threshold of significance for the Central APC of 7.6 work VMT per employee. The VMT Calculator outputs and additional details regarding the analysis are provided in Appendix N-1 of this Draft EIR.

(c) VMT Conclusion

The Project and the Project with the East Site Hotel Option would be below the City's household and work VMT significance thresholds, as applicable. Therefore, the Project would result in less than significant VMT impacts.

(2) Mitigation Measures

Impacts related to VMT were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts related to VMT were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

The Project and the Project with the East Site Hotel Option would include the same transportation-related access, circulation, and ground level design. Accordingly, Project impacts under Threshold (c) would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

(1) Impact Analysis

Pedestrian access to the Project Site would be provided via sidewalks around the perimeter of the Project Site, as well as a wide, landscaped paseo extending east-west through the Project Site and connecting Argyle Avenue to Ivar Avenue. Residents, visitors, patrons, and employees arriving to the Project Site by bicycle would have the same access opportunities as pedestrians and would be able to utilize on-site bicycle parking facilities. A signalized mid-block crosswalk is proposed across Argyle Avenue to help facilitate local pedestrian circulation and access by maintaining a path of east-west travel with the existing mid-block crosswalks across Ivar Avenue and Vine Street. This signal would also control the intersection of Argyle Avenue with Carlos Avenue and a Project driveway. The Project's access locations would be designed to comply with City standards and would provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian safety. All roadways and driveways would continue to intersect at right angles. Street trees would be designed and located so as to not significantly impede driver and pedestrian visibility and would not present a hazard. Pedestrian entrances separated from vehicular driveways would provide access from the adjacent streets, parking facilities, and transit stops.

The Project would include the following two full-access driveways providing vehicular access to parking lots on the Project site:

- West Site – Stop-controlled driveway with full-access to and from Ivar Avenue.
- East Site – Full-access driveway aligned opposite Carlos Avenue providing signalized full access to and from Argyle Avenue.

Access to the Capitol Records Complex (including both the Capitol Records Building and the Gogerty Building) would continue to be provided via the existing driveway on Yucca Street. There would be no vehicular access on Vine Street.

While there are currently five curb cuts on the West Site and six curb cuts on the East Site (11 total), the Project would reduce the number of curb cuts to two curb cuts on the West Site and three curb cuts on the East Site. Furthermore, the existing curb cuts that would be removed would restore continuity to the sidewalks along the existing Hollywood Walk of Fame while improving safety.

In addition to Project driveways serving the West Site via Ivar Avenue and the East Site via Argyle Avenue, each building would have a separate service vehicle driveway. On the West Site, the service vehicle driveway would be north of the resident/visitor driveway on Ivar Street. On the East Site, the service vehicle driveway would utilize an existing curb cut that provides access to the alley behind the Pantages Theatre, south of the Project driveway at Argyle Avenue and Carlos Avenue.

The resident/visitor and service driveways would be designed to comply with LADOT standards. The driveways would not require the removal or relocation of existing passenger transit stops, and would be designed and configured to avoid potential conflicts with transit services and pedestrian traffic. Several streets on the Project frontages are part of designated City networks, such as the City's bike lane network, HIN, and PEDs. The Project would not substantially increase hazards, conflict, or preclude City action to fulfill or implement projects associated with these networks and would contribute to overall walkability through enhancements to the Project Site, streetscape, and crossing of Argyle Avenue.

Based on the above, the Project and the Project with the East Site Hotel Option would not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses and impacts would be less than significant.

(2) Mitigation Measures

Impacts related to hazardous design features were determined to be less than significant without mitigation; therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts related to hazardous design features were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (d): Would the Project result in inadequate emergency access?

The Project and the Project with the East Site Hotel Option would include the same transportation-related access, circulation, and ground level design. Accordingly, Project impacts under Threshold (d) would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

(1) Impact Analysis

The Project Site is located in an established urban area that is well-served by the surrounding roadway network, and multiple routes exist in the area for emergency vehicles and evacuation. Drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. As discussed in Section IV.F, *Hazards and Hazardous Materials*, none of the streets adjacent to the Project Site are designated Disaster Routes or City-selected disaster routes. During construction, the Project will implement a Construction Traffic Management Plan (Project Design Feature TRAF-PDF-2) and Construction Worker Parking Plan (Project Design Feature TRAF-PDF-3) to ensure adequate emergency access is maintained in and around the Project Site throughout all construction activities.

No policy or procedural changes to an existing risk management plan, emergency response plan, or evacuation plan would be required due to Project implementation. No street widening would be necessary with the Project or the Project with the East Site Option. Furthermore, all Project driveways and the internal circulation would be subject to LAFD review to confirm adequate access is provided internally for on-site emergency vehicle access. For these reasons, the Project and the Project with the East Site Option would not result in inadequate emergency access. **Therefore, impacts under the Project and the Project with the East Site Hotel Option with respect to emergency access would be less than significant.**

(2) Mitigation Measures

Impacts related to emergency access were determined to be less than significant without mitigation; therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts related to emergency access were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

The Project and the Project with the East Site Hotel Option would be below the applicable VMT thresholds for significant impacts, include the same transportation-related access, circulation, and ground level design, and result in less-than-significant Project-level transportation impacts. Accordingly, cumulative impacts would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the cumulative impact analysis, impact significance, and mitigation measures presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

(1) Impact Analysis

The two nearest related projects are the adjacent citizenM Hotel Project and Argyle House. The citizenM Hotel Project to the south of the East Site would retain its current driveway off of Vine Street. Pedestrian circulation within and adjacent to the citizenM Hotel project site would be enhanced via sidewalks, new landscaping, original art mural artwork, and decorative pavement within the hotel's entrance area and along the perimeters of the Project Site. The citizenM Hotel Project would also provide short-and long-term bicycle parking that exceed LAMC requirements to qualify for reductions in parking in an effort to promote alternative transportation. The Project would include the removal of five existing curb cuts along Vine Street and result in no driveways along Vine Street. Thus, the Project and the citizenM Hotel Project together would positively contribute to enhanced pedestrian activity along Vine Street. Neither the Project nor the citizenM Hotel Project would preclude bicycle lanes on Vine Street. The Argyle House at the southwest corner of Yucca Street and Argyle Avenue has recently been completed. Its vehicular access is from a driveway on Argyle Avenue, with no driveways occurring along Yucca Street, to promote safety in accordance with the Vision Zero, as this segment of Yucca Street has been identified as part of the HIN. Also, no new driveways are proposed along Yucca Street, though one existing driveway would remain on Yucca Street, east of Vine Street. Overall, the Project's locations of driveways are intended to minimize disruptions to the pedestrian right-of-way and would result in a reduction in the number of curb cuts from 12 to five, which would promote pedestrian circulation and safety along these streets shared with adjacent related projects. Wide sidewalks have also been provided along its Yucca Street and Argyle Avenue frontages.

Vine Street, north of Hollywood Boulevard, has been identified as part of a PED and is designated for Tier 2 bicycle lanes in Mobility Plan 2035. Also, as with the Project, these related projects include adequate bicycle facilities and include high density urban uses in proximity to the nearby multi-modal transportation facilities. Finally, these related projects, as with the Project, do not conflict with adjacent street designations and classifications. No street widenings would be necessary for these projects. Other related projects located in further proximity to the Project Site do not share adjacent street frontages with the Project Site that are part of the

HIN or a PED. Accordingly, there would be no significant cumulative impacts to which both the Project and other nearby related projects contribute to in regard to transportation policies or standards adopted to protect the environment and support multimodal transportation options and a reduction in VMT.

According to the TAG, for projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e., VMT per capita or VMT per employee) in the project impact analysis, a less-than-significant project impact conclusion is sufficient in demonstrating there is no cumulative VMT impact. Projects that fall under the City's efficiency-based impact thresholds are already shown to align with the long-term VMT and GHG reduction goals of the SCAG 2016-2040 RTP/SCS. As demonstrated in the Project–level VMT analysis above, the Project's VMT household and work per capita would be below the City's efficiency-based impact thresholds, and as such, the Project's contribution to cumulative transportation VMT impacts would not be considerable. Furthermore, it is also acknowledged that as discussed in Sections IV. B, *Air Quality*, and Section IV.E*, Greenhouse Gas Emissions*, of this Draft EIR, the Project would be consistent with, and would not conflict with, applicable 2016-2040 RTP/SCS actions and strategies to reduce GHG emissions.

With regard to design hazards, the Project would not result in a significant impact. Each related project would be reviewed by the City to ensure compliance with the City's requirements relative to the provision of safe access for vehicles, pedestrian, and bicyclists, which would incorporate standards for adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls to protect pedestrian and enhance bicycle safety. Furthermore, since modifications to access and circulation plans are largely confined to a project site and immediate surrounding area, a combination of impacts with other related projects that could potentially lead to cumulative impacts is not expected. Therefore, the Project's contribution to cumulative impacts associated with hazardous design conditions would not be considerable.

With regard to emergency access, the Project would not result in a significant impact. The Project Site and the surrounding Hollywood area are located in an established urban area that is well-served by the surrounding roadway network, and multiple routes exist in the area for emergency vehicles and evacuation. Drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. As discussed in Section IV.F, *Hazards and Hazardous Materials*, of this Draft EIR, none of the streets within or adjacent to the Project Site are designated Disaster Routes City-selected disaster routes. Similar to the Project, related projects would implement Construction Traffic Management Plans and Construction Worker Parking Plans to ensure adequate emergency access is maintained in and around the related project sites throughout all construction activities. Coordination of these plans will ensure construction activities of the

concurrent related projects and associated hauling activities are managed in collaboration with one another and the Project.

No policy or procedural changes to an existing risk management plan, emergency response plan, or evacuation plan would be required due to Project implementation. No street widening would be necessary with the Project. As with the Project, related projects would be reviewed by the LAFD to ensure compliance with the City's requirements relative to the provision of emergency access. Furthermore, since modification to emergency access and circulation plans are largely confined to a project site and immediate surrounding area, a combination of impacts with other related projects that could potentially lead to cumulative impacts is not expected. Therefore, the Project's contribution to cumulative emergency access impacts would not be considerable.

Based on the above, the Project's and the Project with the East Site Hotel Option's contribution to cumulative transportation impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

(2) Mitigation Measures

Cumulative impacts related to transportation would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts on transportation were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

4. California Department of Transportation Supplemental Analysis

The City of Los Angeles and the California Department of Transportation have actively engaged in discussions regarding the Project's transportation impacts and analyses. The City participated in two meetings with Caltrans on December 19, 2018, and February 26, 2019, where Caltrans requested off-ramp queuing and freeway mainline merge and weaving analyses. Following these meetings, the City received a comment letter dated April 22, 2019 from Caltrans providing recommendations for the Project's Draft EIR traffic analysis focusing on potential traffic conflicts pertaining to direct and cumulative trips on state facilities in the Project vicinity, including off-ramp queuing and mainline merge and weaving analysis at requested locations. The City responded to the Caltrans letter on February 25, 2020, noting that the City of Los Angeles had adopted VMT as required by SB 743, and invited Caltrans to provide updated comments based on SB 743 and the most recent updates to the CEQA Guidelines. In a second letter, dated March 5, 2020, Caltrans asserted that the previously identified highway

capacity issues were safety traffic concerns. Refer to Appendix I of the TA for copies of the Caltrans letters. The City subsequently responded to the letter on April 10, 2020, highlighting SB 743, Caltrans' Local Development – Intergovernmental Review Program Interim Guidance (LD-IGR), and the City's recent efforts, such as the Vision Zero initiative to actively identify safety conflicts for all transportation users, and which has implemented a range of physical improvements demonstrated to reduce conflict and fatalities on the City's roadways. In addition, the City requested additional information from Caltrans regarding adopted protocols Caltrans specifically uses to address safety concerns.

Nevertheless, the analyses requested by Caltrans are presented for informational purposes in Appendix I to the Transportation Assessment for the Hollywood Center Project, provided in Appendix N-1 of this Draft EIR. As shown in Appendix I to the Transportation Assessment, the analyses determined that the addition of Project or the Project with the East Site Hotel Option traffic would not result in substantial direct or cumulative effects to the freeway mainline or off-ramp queuing, and is also not considered to have a traffic safety effect on the off-ramps, freeway segments, and intersections identified in Caltrans' letters.

IV. Environmental Impact Analysis

M. Tribal Cultural Resources

1. Introduction

This section addresses potential impacts to tribal cultural resources. The analysis of tribal cultural resources provided in this section is based on a Sacred Lands File (SLF) search conducted by the California Native American Heritage Commission (NAHC), project notification letters submitted by the City to Native American individuals and organizations, and follow-up Native American consultations pursuant to Assembly Bill (AB) 52. The findings of these studies are presented in the Hollywood Center Project Assembly Bill 52 Consultation Summary Report, which is provided in Appendix O, of this Draft EIR.

Tribal cultural resources are defined by the California Public Resources Code (PRC) Section 21074 as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the California Register of Historical Resources (California Register) or included in a local register of historical resources, or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant.[1] Historical resources, unique archaeological resources, or non-unique archaeological resources may also be tribal cultural resources if they meet these criteria.

2. Environmental Setting

a) Regulatory Framework

(1) State

(a) Assembly Bill 52

AB 52 was approved by California State Governor Brown on September 25, 2014. AB 52 amended PRC Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 applies specifically to projects for which a Notice of Preparation (NOP) or a Notice of Intent to Adopt a Negative Declaration (ND) or Mitigated Negative Declaration (MND) will be filed on or after July 1, 2015. The primary intent of AB 52 was to include

[1] A cultural landscape that meets these criteria is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

California Native American Tribes early in the environmental review process and to establish a new category of resources related to Native Americans that require consideration under the California Environmental Quality Act (CEQA), known as tribal cultural resources. PRC Sections 21074(a)(1) and 21074(a)(2) define tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe" that are either included or determined to be eligible for inclusion in the California Register or included in a local register of historical resources, or a resource that is determined to be a tribal cultural resource by a lead agency, in its discretion and supported by substantial evidence. Further, as stated under PRC Section 21074(b), "a cultural landscape that meets these criteria is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. Historical resources, unique archaeological resources, or non-unique archaeological resources may also be tribal cultural resources if they meet these criteria." On July 30, 2016, the California Natural Resources Agency adopted the final text for tribal cultural resources provided in Appendix G of the CEQA Guidelines, which was approved by the Office of Administrative Law on September 27, 2016.

PRC Section 21080.3.1 requires that within 14 days of a lead agency determining that an application for a project is complete, or a decision by a public agency to undertake a project, the lead agency provide formal notification to the designated contact, or a tribal representative, of California Native American Tribes that are traditionally and culturally affiliated with the geographic area of the project (as defined in PRC Section 21073) and who have requested in writing to be informed by the lead agency (PRC Section 21080.3.1(b)). Tribes interested in consultation must respond in writing within 30 days from receipt of the lead agency's formal notification and the lead agency must begin consultation within 30 days of receiving the tribe's request for consultation (PRC Sections 21080.3.1(d) and 21080.3.1(e)).

PRC Section 21080.3.2(a) identifies the following as potential consultation discussion topics: the type of environmental review necessary; the significance of tribal cultural resources; the significance of the project's impacts on the tribal cultural resources; project alternatives or appropriate measures for preservation; and mitigation measures. Consultation is considered concluded when either (1) the parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached (PRC Section 21080.3.2(b)).

If a California Native American tribe has requested consultation pursuant to Section 21080.3.1 and has failed to provide comments to the lead agency, or otherwise failed to engage in the consultation process, or if the lead agency has complied with Section 21080.3.1(d) and the California Native American tribe has

failed to request consultation within 30 days, the lead agency may certify an EIR or adopt an MND (PRC Section 21082.3(d)(2) and (3)).

PRC Section 21082.3(c)(1) states that any information, including, but not limited to, the location, description, and use of the tribal cultural resources, that is submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public without the prior consent of the tribe that provided the information. If the lead agency publishes any information submitted by a California Native American tribe during the consultation or environmental review process, that information shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.

Confidentiality does not, however, apply to data or information that are, or become publicly available, are already in lawful possession of the project applicant before the provision of the information by the California Native American tribe, are independently developed by the project applicant or the project applicant's agents, or are lawfully obtained by the project applicant from a third party that is not the lead agency, a California Native American tribe, or another public agency (PRC Section 21082.3(c)(2)(B).

b) Existing Conditions

(1) Ethnographic Setting

The Project Site is located in a region traditionally occupied by the Takic-speaking Gabrielino Indians. The term "Gabrielino"[2] is a general term that refers to those Native Americans, who were administered by the Spanish at the Mission San Gabriel Arcángel. Prior to European colonization, the Gabrielino occupied a diverse area that included the watersheds of the Los Angeles, San Gabriel, and Santa Ana rivers; the Los Angeles basin; and the islands of San Clemente, San Nicolas, and Santa Catalina.[3] Their neighbors included the Chumash to the north, the Juañeno to the south, and the Serrano and Cahuilla to the east. The Gabrielino are reported to have been second only to the Chumash in terms of

[2] The term "Gabrielino" is a general term used in ethnographies cited in this section, that refers to those Native Americans who were administered by the Spanish at the Mission San Gabriel Arcángel. In the modern era, individual tribal entities have adopted various spellings of the name as seen in Table IV.M-1 below.

[3] Kroeber, A. L., Handbook of the Indians of California, Bureau of American Ethnology, Bulletin 78, Smithsonian Institution, Washington, D. C., 1925, p. 620.

population size and regional influence.[4] The Gabrielino language is part of the Takic branch of the Uto-Aztecan language family. The Gabrielino were hunter-gatherers, who lived in permanent communities located near the presence of a stable food supply. Subsistence consisted of hunting, fishing, and gathering.

There were possibly more than 100 mainland villages, and Spanish reports suggest that village populations ranged from 50 to 200 people.[5] Prior to actual Spanish contact, the Gabrielino population had been decimated by diseases, probably spread by early Spanish maritime explorers. Villages are reported to have been the most abundant in the San Fernando Valley, the Glendale Narrows area north of Downtown Los Angeles, and around the Los Angeles River's coastal outlets.[6] A map of Gabrielino villages, based on documents from the Portola expedition in 1769 and other ethnographic records, indicates that the closest Gabrielino site to the Project Site is the village and sacred site of *Kawegna,* the source of the name for Cahuenga Boulevard. This site is located approximately three miles northwest of the Project Site in the general area of Toluca Lake and Universal City. The next closest village to the Project Site is the village of *Maungna,*[7] which once was situated at the current location of Rancho Los Feliz, about 3.5 miles northeast of the Project Site.

(2) Archival Research Summary

As noted in the Cultural Resources Assessment Report,[8] archival research was conducted for the Project, which included a records search at the California Historical Resources Information System (CHRIS) South Central Coastal Information Center (SCCIC).

The records search results indicate that 23 cultural resources studies have been conducted and are presently on-file with the SCCIC within a 0.5-mile radius of the Project Site. Approximately 60 percent of the 0.5-mile records search radius has been included in previous cultural resources surveys. Of the 23 previous studies, three studies overlap with the Project Site. Additionally, the records search results indicate that one archaeological resource and three historic architectural resources (two historic architectural districts) have been recorded within a 0.5-mile radius of

4 Bean, Lowell J., and Charles R. Smith, Gabrielino, in California, edited by R.F. Heizer, pp. 538-549 Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution, Washington, D.C., 1978, p. 538.

5 Bean, Lowell J., and Charles R. Smith, Gabrielino, in California, edited by R.F. Heizer, pp. 538-549 Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution, Washington, D.C., 1978, p. 540.

6 Gumprecht, Blake, Los Angeles River: Its Life, and Possible Rebirth, The Johns Hopkins University Press, Baltimore, Reprinted 2001, p. 31.

7 McCawley, William, The First Angelinos: The Gabrielino Indians of Los Angeles, Malki Museum Press, Banning, California, 1996, p. 55.

8 ESA, Phase I Cultural Resources Assessment Report, January 2019. Provided in Appendix F-2 of this Draft EIR.

the Project Site. Further details of these resources can be found in the Cultural Resources Assessment Report.[9]

(3) Identification of Tribal Cultural Resources

(a) Sacred Lands File Search

The California NAHC maintains a confidential SLF, which contains sites of traditional, cultural, or religious value to the Native American community. A search of the SLF was requested from the NAHC on April 5, 2018. The NAHC responded in a letter dated April 18, 2018, that sites are not known to be located within the Project Site.[10]

(b) Assembly Bill 52 Tribal Consultation

In compliance with the requirements of AB 52, the City of Los Angeles Department of City Planning provided formal notification of the Project via FedEx and certified mail to Native American groups that are listed on the City's AB 52 contact list, on September 4, 2018, providing a 30-day response period ending on October 30, 2018. A summary is provided below in **Table IV.M-1**, *Summary of AB 52 Consultation*. The letters included a description of the Project, the Project location, and a notification of the type of consultation being initiated. The City received a response from three (3) of the 10 Native American groups, two (2) of which, to date, have submitted formal consultation responses: Gabrieleño Band of Mission Indians - Kizh Nation (Kizh Nation) and the Gabrielino Tongva Nation (Tongva Nation). The third group, the Fernandeño Tataviam Band of Mission Indians, deferred consultation to members of the Kizh Nation Tribe. The other Native American groups contacted by the City have not responded.

On September 10, 2018, an email was received by the City from "Admin Specialist" for the Kizh Nation, requesting AB 52 consultation. Included in the email was a formal letter response from Andy Salas, Tribal Chairman, and a map depicting the territories of original peoples in Southern California. On December 5, 2018, representatives from the City and the Kizh Nation consulted via telephone conference. During the call, the Kizh Nation provided their knowledge of the Project Site and their concerns about the Project. The Kizh Nation indicated that two existing trade routes overlap the Project Site. The City submitted a follow up email on December 6, 2018, requesting substantial evidence be provided within 14 days. On January 3, 2019, January 22, 2019 and again on March 4, 2019, the City followed up with the Kizh Nation to extend the deadline for providing substantial evidence. To date, no further documentation or response has been received.

9 ESA, Phase I Cultural Resources Assessment Report, January 2019. Provided in Appendix F-2 of this Draft EIR.

10 Native American Heritage Commission, SLF Response Letter for the Proposed Hollywood Center EIR Project, 2018. Prepared for ESA. Letter on File at ESA.

TABLE IV.M-1
SUMMARY OF AB 52 CONSULTATION

Contact	Tribe/Organization	Date AB 52 Notice Sent	Response Received	Date AB 52 Initiation Sent	Consultation Results
Kimia Fatehi, Director, Public Relations	Fernandeño Tataviam Band of Mission Indians	09/04/2018	09/05/2018	-	Consultation deferred
Andrew Salas, Chairperson	Gabrieleño Band of Mission Indians – Kizh Nation	09/04/2018	09/10/2018	09/11/2018	Telephone conference 12/05/2018
Robert F. Dorame, Tribal Chair/Cultural Resources	Gabrielino Tongva Indians of California Tribal Council	09/04/2018	No response	-	-
Sam Dunlap, Cultural Resources Director	Gabrielino/ Tongva Nation	09/04/2018	10/03/2018	10/04/2018	In person meeting 10/19/2018
Sandonne Goad, Chairperson	Gabrielino/Tongva Nation	09/04/2018	No response	-	-
Anthony Morales, Chairperson	Gabrielino/Tongva San Gabriel Band of Mission Indians	09/04/2018	No response	-	-
Charles Alvarez, Co-Chairperson	Gabrielino-Tongva Tribe	09/04/2018	No response	-	-
Joseph Ontiveros, Cultural Resource Director	Soboba Band of Luiseño Indians	09/04/2018	No response	-	-
John Valenzuela, Chairperson	San Fernando Band of Mission Indians	09/04/2018	No response	-	-
Michael Mirelez, Cultural Resource Coordinator	Torres Martinez Desert Cahuilla Indians	09/04/2018	No response	-	-

SOURCE: ESA, 2019.

On October 3, 2018, Sam Dunlap, Cultural Resources Director for the Tongva Nation, responded via email to the City and requested to engage in AB 52 consultation. On October 4, 2018, City staff responded via email to the Tongva Nation initiating consultation and requesting dates that the Tongva Nation would be available for a meeting. No response from the Tongva Nation was received. On October 10, 2018, City staff emailed the Tongva Nation again inquiring about a preferred date and time for a consultation meeting. Following a telephone conversation between City staff and Mr. Dunlap on October 10, 2018, City staff sent an email on October 11, 2018, to Mr. Dunlap confirming the meeting date,

time, and location, for a meeting scheduled for October 19, 2018. City staff also requested in the October 11, 2018, email that Mr. Dunlap bring any documentation or materials that he would like to submit to the City in consideration of the analysis of tribal cultural resources in connection with the Project.

On November 1, 2018, City staff sent an email to Mr. Dunlap, summarizing the in-person consultation meeting that took place on October 19, 2018. In the email, City staff noted that Mr. Dunlap discussed the background history of several tribes and was concerned with the proper mitigation during construction activities, including monitoring for the Project. If such monitoring was warranted, he requested that the City not specify any particular tribe in the mitigation. City staff also mentioned that during the consultation meeting, staff had requested documentation that would assist the City in their analysis of tribal cultural resources and noted that no further documentation had been provided by the Tongva Nation to date. City staff also informed the Tongva Nation of the new point of contact for the Project. On March 27, 2019, City staff sent an email indicating that no information had been received and extended the deadline to provide documentary information to April 10, 2019. To date, no further documentation or response has been received, and no tribal cultural resources have been identified as a result of the consultation with the Tongva Nation.

No further correspondence, beyond what is described above, has been received by the City from either the Kizh Nation or the Tongva Nation and as such, close out letters were sent to both tribes on April 8, 2020.

3. Project Impacts

a) Thresholds of Significance

In accordance with the Appendix G of the CEQA Guidelines, a project would have a significant impact related to tribal cultural resources if it would:

Threshold (a): 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:

i) 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

ii) 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

b) Methodology

Under CEQA, the evaluation of impacts to tribal cultural resources consists of two-parts: (1) identification of tribal cultural resources within the project site or immediate vicinity through AB 52 consultation, as well as a review of pertinent academic and ethnographic literature for information pertaining to past Native American use of the project area, SLF search, and SCCIC records review; and (2) a determination of whether the project may result in a "substantial adverse change" in the significance of the identified resources.

c) Project Design Features

No specific Project Design Features are proposed with regard to tribal cultural resources.

d) Project Impacts

Threshold (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:

i) 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)?

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

Construction activities, including excavation depths, building footprint and construction methods, would be essentially the same under the Project and the Project with the East Site Hotel Option. Accordingly, Project-related tribal cultural resources impacts would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the construction impact analysis and impact significance for the Project presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

(1) Impact Analysis

No prehistoric archaeological resources have been previously recorded within the Project Site itself or within a 0.5-mile radius of the Project Site. The SLF search conducted by the NAHC indicated that the Project Site was negative for known sacred tribal lands. While the Kizh Nation indicated that two existing trade routes overlap the Project Site, to date, no further documentation or substantial evidence regarding these trade routes has been received, and no known tribal cultural resources have been identified as a result of the research or consultation with the tribes. Therefore, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource, as defined in PRC Section 21074.

While no tribal cultural resources are anticipated to be affected by the Project, the City has established a standard Condition of Approval under its police power and land use authority to address any inadvertent discovery of a tribal cultural resource. In the unlikely event that tribal cultural resources are inadvertently encountered during Project construction, the Project Applicant would be required to comply with the City's standard Condition of Approval for the treatment of inadvertent tribal cultural resource discoveries. This City's standard Condition requires the immediate halt of construction activities in the vicinity of the discovery, coordination with appropriate Native American tribes and the City, and development and implementation of appropriate actions for treating the discovery.

Therefore, the Project or the Project with the East Site Hotel Option would not cause a substantial adverse change in the significance of a tribal cultural resource, as defined in PRC Section 21074, and, with adherence to the City's standard Condition of Approval for the treatment of inadvertent tribal cultural resource discoveries, impacts to unknown tribal cultural resources would be less than significant.

(2) Mitigation Measures

Impacts to tribal cultural resources were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding tribal cultural resources were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

Construction activities, including excavation depths, building footprint and construction methods, would be essentially the same under the Project and the Project with the East Site Hotel Option. Accordingly, Project-related cumulative impacts would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the cumulative impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

(1) Impact Analysis

As demonstrated above, the Project would have a less-than-significant impact on tribal cultural resources. Specifically, there are no resources listed or determined eligible for listing, on the national, State, or local register of historical resources, and the Lead Agency determined that no resources were identified during AB 52 tribal consultation that are eligible for listing under the criteria in PRC Section 5024.1(c). As with the Project, each related project would also be required to engage in AB 52 consultation with Native American tribes in order to identify any tribal cultural resources that could potentially be impacted by the related project and to address potentially significant impacts, if identified. The related projects would also be required to comply with the City's standard Condition of Approval for the treatment of inadvertent tribal cultural resource discoveries. **Accordingly, because no known tribal cultural resources are located within the Project Site, and given the low potential to encounter unknown resources, the Project's or the Project with the East Site Hotel Option's contribution to cumulative impacts would not be cumulatively considerable. As such, cumulative impacts on tribal cultural resources would be less than significant.**

(2) Mitigation Measures

Cumulative impacts regarding tribal cultural resources were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts regarding tribal cultural resources were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

IV. Environmental Impact Analysis

N.1 Wastewater

1. Introduction

This section addresses potential Project impacts on existing wastewater conveyance infrastructure and treatment facilities that would serve the Project Site. The analysis provides an overview of existing infrastructure and facilities and evaluates whether sufficient capacity is available to serve the Project's estimated wastewater generation. Information regarding existing wastewater infrastructure, conveyance and treatment capacity, and Project improvements is based, in part, on the Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Utility Technical Report) prepared for the Project by KPFF Consulting Engineers.[1] The Utility Technical Report is provided in Appendix P-1, Utilities Service Provider Documentation, of this Draft EIR.

2. Environmental Setting

a) Regulatory Framework

(1) State

The California Green Building Standards Code, commonly referred to as the CALGreen Code, is set forth in California Code of Regulations (CCR) Title 24, Part 11, and establishes voluntary and mandatory standards pertaining to the planning and design of sustainable site development and water conservation, among other issues. Under the CALGreen Code, all water closets (i.e., flush toilets) are limited to 1.28 gallons per flush, and urinals are limited to 0.5 gallon per flush. In addition, maximum flow rates for faucets are established at 2.0 gallons per minute (gpm) at 80 pounds per square inch (psi) for showerheads, 1.2 gpm at 60 psi for residential lavatory faucets, and 1.8 gpm at 60 psi for kitchen faucets.

[1] KPFF Consulting Engineers, Hollywood Center Utility Infrastructure Technical Report: Water, Wastewater and Energy, April 1, 2020. Provided in Appendix P-1 of this Draft EIR.

(2) Local

(a) City of Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element) establishes the conceptual basis for the City's General Plan.[2] The General Plan Framework sets forth a comprehensive Citywide long-range growth strategy and defines Citywide policies regarding land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, infrastructure and public services. Chapter 9, Infrastructure and Public Services, of the City's General Plan Framework identifies goals, objectives, and policies for utilities in the City, including wastewater collection and treatment. Goal 9A is to provide adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.[3]

(b) Hollywood Community Plan

The Land Use Element of the City's General Plan is comprised of 35 Community Plans. The City's Community Plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use at the community level. The Community Plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems.[4] The City's Community Plans implement the City's Framework Element at the local level, express the goals, objectives, policies, and programs to address growth within each of the individual communities and depict the desired arrangement of land uses, as well as street classifications and the locations and characteristics of public service facilities. The Project is located within the Hollywood Community Plan area.

The Hollywood Community Plan was adopted in 1988 and addresses growth and the arrangement of land uses within its boundaries through the year 2010.[5] The Hollywood Community Plan does not provide specific policies for provision of sewer services. However, it does provide general guidance for "service systems" and states that they shall be provided in a sequenced manner to provide a balance between land use and service facilities at all times. Service systems are defined as "public facilities" and while focusing on services such as schools and libraries, but may also be inclusive of utilities.[6]

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2 City of Los Angeles Department of City Planning, City of Los Angeles General Plan, Citywide General Plan Framework Element, 1995.

3 City of Los Angeles Department of City Planning, City of Los Angeles General Plan, Citywide General Plan Framework, Chapter 9: Infrastructure and Public Services – Wastewater, 1995.

4 City of Los Angeles Department of City Planning, City of Los Angeles General Plan, Citywide General Plan Framework, Chapter 3, Land Use, 1995.

5 City of Los Angeles Department of City Planning, Hollywood Community Plan, adopted December 13, 1988, p. HO-2.

6 City of Los Angeles Department of City Planning, Hollywood Community Plan, adopted December 13, 1988, pp. HO-5 and HO-6.

(c) Los Angeles Integrated Resources Plan

The City's Integrated Resources Plan (IRP) is a series of reports that document collaborative, comprehensive Los Angeles Basin-wide water resources planning in Los Angeles.[7,8] Jointly developed by the City of Los Angeles Department of Public Works (LADPW) Bureau of Sanitation (LASAN) and the Department of Water and Power (LADWP), the IRP acknowledges and addresses the interrelated management of wastewater, stormwater, and recycled water in the City and surrounding service areas.

The current IRP was adopted in November 2006 by the Los Angeles City Council and addresses facilities planning (including projected needs and planned improvements and upgrades), financial planning, and environmental documentation for wastewater conveyance systems, recycled water systems, and stormwater management programs through the year 2020. During initial IRP planning (Phase I) starting in 1999, the City engaged stakeholders and the general public to define the gaps in the current water resources systems, the ability to serve future populations, and themes or thematic alternatives including new construction, resources management, and demand management, to guide plans for future facilities. A series of Guiding Principles were defined to frame future planning decisions, broadly including building new wastewater facilities and decreasing dependency on imported water; identifying the best uses for recycled water, such as for industrial, irrigation, and groundwater recharge purposes; reducing runoff inflow into the wastewater system; increasing reuse of dry weather urban runoff; increasing water conservation; the beneficial use of biosolids; and examining low-cost solutions for meeting the City's future wastewater needs.

During Phase II of planning, leading up to IRP adoption in 2006, alternative approaches to water resources management were selected and evaluated in collaboration with stakeholders, with the goal of identifying an Approved Alternative that implemented the Guiding Principles identified in Phase I of planning and supported increased wastewater collection and treatment capacity, water reclamation storage and beneficial use, water conservation, and stormwater management opportunities.

To plan for future wastewater management in particular, the IRP projects future wastewater generation based on population projections from the Southern California Association of Governments (SCAG). As shown in **Table IV.N.1-1**, *Population and Average Dry Weather Flow Projections: Hyperion Water Reclamation Plant Sanitary Sewer System Service Area*, the forecasted population for the Hyperion Water Reclamation Plant Sanitary Sewer System (Hyperion Sanitary Sewer System) service area was approximately 4,485,054 residents in 2010, approximately 4,641,928 residents

7 City of Los Angeles Department of Public Works Bureau of Sanitation (LASAN) and Los Angeles Department of Water and Power (LADWP), City of Los Angeles Integrated Resources Plan (IRP) – Planning for Wastewater, Recycled Water and Stormwater Management: A Visionary Strategy for the Right Facilities, in the Right Places, at the Right Time, Executive Summary, December 2006, p 3.

8 LASAN and LADWP, City of Los Angeles IRP, Executive Summary, Summary Report, and Volumes 1 through 5, December 2006.

in 2015, and approximately 4,854,483 residents in 2020.[9] The wastewater flow projections account for planned levels of water conservation and assumed levels of collection system maintenance and rehabilitation.

TABLE IV.N.1-1
POPULATION AND AVERAGE DRY WEATHER FLOW PROJECTIONS:
HYPERION SANITARY SEWER SYSTEM SERVICE AREA

	2000	2005	2010	2015	2020
SCAG Population	4,138,567	4,331,109	4,485,054	4,641,928	4,854,483
Average Dry Weather Flow (in mgd)	443.1	461.8	477.3	492.3	511.5

SOURCE: LASAN and LADWP, City of Los Angeles IRP, Volume 1, Wastewater Management, December 2006, p. 3-12.

The average dry weather flow projected by the IRP was estimated to be approximately 477.3 million gallons per day (mgd) in 2010;[10] approximately 492.3 mgd in 2015;[11] and approximately 511.5 mgd in 2020,[12] with each amount falling within the system-wide treatment capacity of 550 mgd. The Hyperion Sanitary Sewer System received an average dry weather flow of 330.4 mgd in 2016, which is lower than IRP projections and thus indicates that the system likely has more remaining capacity than anticipated when the IRP was adopted in 2006.[13]

Despite the current and projected availability of system-wide treatment capacity, the IRP includes several proposals for improvements, additions, and expansions within the Hyperion Sanitary Sewer System service area to maintain adequate service over time. As the Hyperion Water Reclamation Plant (HWRP) is part of the larger City sanitary sewer system, including other treatment plants (i.e., Donald C. Tillman Water Reclamation Plant [TWRP], Los Angeles-Glendale Water Reclamation Plant [LAGWRP], Terminal Island Water Reclamation Plant [TTP], and the City's Regional Sanitary Sewer System), connecting outfalls, and numerous sewer connections and major interceptors, current and future implementation of the IRP and its corresponding expansion projects will support continued availability of capacity at the HWRP.

9 The population projections provided in Table 3-7 of the IRP are based on Southern California Association of Governments (SCAG) 2002 projections. It should be noted that more recent SCAG projections are available in the 2016 Regional Transportation Plan/Sustainable Communities Strategy. However, the IRP focuses on the population for the wastewater service area, and more recent data is not available in that respect.

10 LASAN and LADWP, City of Los Angeles IRP, Volume 1, Wastewater Management, Table 4-11, December 2006, p. 4-16.

11 LASAN and LADWP, City of Los Angeles IRP, Volume 1, Wastewater Management, Table 4-12, December 2006, p. 4-17.

12 LASAN and LADWP, City of Los Angeles IRP, Volume 1, Wastewater Management, Table 4-13, December 2006, p. 4-17.

13 City of Los Angeles. One Water LA 2040 Plan, Volume 2, Wastewater Facilities Plan, April 2018, Table ES.4, accessed March 16, 2020.

Certification of the Final EIR for the IRP included adoption of the "Approved Alternative" (Alternative 4). Components of Alternative 4 included a list of wastewater “Go Projects” for which associated demand or regulatory triggers have already been met. These include treatment and collection system projects, as follows:

- Construction of a 60-million-gallon wastewater storage at the TWRP;
- Construction of five-million-gallon diurnal storage for wastewater and a five-million-gallon recycled water storage at the LAGWRP, while maintaining the option to upgrade the plant to advance treatment;
- Expansion of the HRWP biosolids handling capacity (e.g., new digesters and truck loading facility);
- Addition of secondary clarifiers at the HRWP to meet existing treatment requirements;
- Construction of a new Glendale Burbank Interceptor Sewer, including air treatment; and
- Construction of a new North East Interceptor Sewer Phase 2.

Alternative 4 also included a list of wastewater “Go To If Projects” to be implemented if and when triggered by an action, need, or regulations. These included the following:

- Expansion and upgrade of the TWRP capacity to 100 mgd with advanced treatment;
- LAG Upgrade to Advanced Treatment and UV disinfection (existing - 20 mgd capacity);
- HTP Secondary Clarifiers (add 100 mgd to get capacity to 450 mgd);
- HTP Digesters (up to 12 total); and
- Construction of a Valley Spring Lane Interceptor Sewer including air treatment.

Implementation of the IRP would increase the overall capacity of the larger City sanitary sewer system by 36 mgd through the expansion of the TWRP capacity from 64 mgd to 100 mgd.[14]

Adoption of the IRP also includes the Adaptive Capital Improvement Program which includes the anticipated capital, operation and maintenance, project timing, and implementation strategy for tracking and monitoring triggers. As discussed in the IRP and CIP and based on LADPW information, projects have been completed within all the treatment plants and sewer lines and additional ongoing improvements have been proposed to continually provide services and meet the wastewater needs of the City. Furthermore, projections show that adequate wastewater treatment services are expected to be available through 2025.

In 2012, the City released the Water IRP 5-Year Review Final Document, a summary compilation of the progress updates between 2007 and 2012 related to new projects and

[14] LASAN and LADWP, City of Los Angeles IRP, 2006 Water IRP Final EIR, Executive Summary, p. ES-2.

programs, technology, and regulations that could affect the implementation of IRP recommendations.[15] The 5-Year Review reported on near-completion of one Go Project (Construction of a 60-million-gallon wastewater storage at the TWRP); moved some of the Go Projects to the Go If Triggered list to reflect their revised prioritization since 2006; and deferred two other Go Projects to beyond the IRP's 2020 horizon date as the associated need is not anticipated. The 5-Year Review also deferred a Go To If Project beyond 2020 due to reduction in need.

(i) One Water LA 2040 Plan

In April 2018, the City prepared the One Water LA 2040 Plan (One Water LA Plan), an integrated approach to Citywide recycled water supply, wastewater treatment, and stormwater management.[16] The new plan will build upon the success of the City's Water IRP, which projected needs and set forth improvements and upgrades to wastewater conveyance systems, recycled water systems, and runoff management programs through the year 2020, and extends its planning horizon to 2040. The One Water LA Plan proposes a collaborative approach to managing the City's future water, wastewater treatment, and stormwater needs with the goal of yielding sustainable, long-term water supplies for Los Angeles to ensure greater resiliency to drought conditions and climate change. The One Water LA Plan is also intended as a step toward meeting the Mayor's Executive Directive to reduce the City's purchase of imported water by 50 percent by 2024.[17] Major challenges addressed in the One Water LA Plan include recurring drought, climate change, and the availability of recycled water in the future in light of declining wastewater volumes.

(d) Sewer System Management Plan

The State requires all publicly owned sanitary sewer systems to have a written Sewer System Management Plan (SSMP). The City has prepared one SSMP for each of the three sanitary sewer systems it operates: Hyperion Sanitary Sewer System, in which the Project is located; Terminal Island Sanitary Sewer System (which includes the TTP that services the Harbor Area in the City); and City of Los Angeles Regional Sanitary Sewer System. These plans include measures to control and mitigate sewer spills and must be made available to the public. The SSMPs further establish design and performance standards for the City's sewer system. It also provides procedures for evaluating the system and providing capacity assurance. It establishes a standard of depth-to-diameter ratio or d/D of 0.75 or greater for identifying sewers in need of replacement or relief.

The City reviews and updates these plans periodically to check for continued compliance with the State's requirements and effectiveness in addressing spills. The plans were updated in January 2019 following a biennial internal audit pursuant to the State requirements.

15 LASAN and LADWP, Water IRP 5-Year Review FINAL Documents, June 2012.
16 City of Los Angeles, One Water LA 2040 Plan, Volume 1, Summary Report, April 2018.
17 City of Los Angeles, Office of the Mayor, Executive Directive No. 5, Emergency Drought Response - Creating a Water Wise City, October 14, 2014.

(e) City of Los Angeles Municipal Code

(i) Los Angeles Green Building Code

The City has been pursuing a number of green development initiatives intended to promote energy conservation and reductions in the amount of greenhouse gas emissions generated within the City. While these ordinances do not focus on the provision of sewer services, they do mandate the use of water conservation features in new developments. Through the use of less water by residents, residual wastewater is reduced, in turn reducing the demand for sewage conveyance and treatment.

The Los Angeles Municipal Code (LAMC) Chapter IX, Article 9, the Los Angeles Green Building Code (LA Green Building Code, Ordinance No. 181,480),[18] was adopted in April 2008 and provides standards and a mechanism for evaluating projects for their water conservation features during site plan review. In 2010, 2014, and 2016, the LA Green Building Code was amended to incorporate various provisions of the CALGreen Code. The LA Green Building Code includes mandatory requirements and elective measures pertaining to wastewater for three categories of buildings, the second of which applies to this Project: (1) low-rise residential buildings; (2) non-residential and high-rise residential buildings; and (3) additions and alterations to residential and non-residential buildings.

(ii) Water Efficiency Requirements Ordinance

LAMC Chapter XII, Article 5, the Water Efficiency Requirements Ordinance (Ordinance No. 180,822),[19] effective December 1, 2009, requires the installation of efficient water fixtures, appliances, and cooling towers in new buildings and renovation of plumbing in existing buildings, to minimize the effect of water shortages for City customers and enhance water supply sustainability.

(iii) Sewer Capacity Availability Review, LAMC Section 64.15

The LAMC includes regulations that require the City to assure available sewer capacity for new projects and fees for improvements to the infrastructure system. LAMC Section 64.15 requires that the City perform a Sewer Capacity Availability Review (SCAR) when an applicant seeks a sewer permit to connect a property to the City's sewer system, proposes additional discharge through their existing public sewer connection, or proposes a future sewer connection or future development that is anticipated to generate 10,000 gallons or more of sewage per day. A SCAR provides a preliminary assessment of the capacity of the existing municipal sewer system to safely convey a project's newly generated wastewater to the appropriate sewage treatment plant.

18 City of Los Angeles, Ordinance No. 181,480, 2010.
19 City of Los Angeles, Ordinance No. 180,822, 2009.

(iv) Sewerage Facilities Charge, LAMC Sections 64.11.2 and 64.16.1

LAMC Sections 64.11.2 and 64.16.1 require the payment of fees for new connections to the City's sewer system to assure the sufficiency of sewer infrastructure. New connections to the sewer system are assessed in a Sewerage Facilities Charge. The rate structure for the Sewerage Facilities Charge is based upon wastewater flow strength as well as volume. The determination of wastewater flow strength for each applicable project is based on City guidelines for the average wastewater concentrations of two parameters, biological oxygen demand and suspended solids, for each type of land use. Sewerage Facilities Charge fees are deposited in the City's Sewer Construction and Maintenance Fund for sewer and sewage-related purposes, including, but not limited to, industrial waste control and water reclamation purposes.

(v) Bureau of Engineering Special Order No. SO 06-0691

The City establishes design criteria for sewer systems to assure that new infrastructure provides sewer capacity and operating characteristics to meet City standards (Bureau of Engineering [BOE] Special Order No. SO 06-0691). Per the Special Order, lateral sewers, which are sewers 18 inches or less in diameter, must be designed for a planning period of 100 years. The Special Order also requires that sewers be designed so that the peak dry weather flow depth during their planning period does not exceed one-half of the pipe diameter (D) (i.e., depth-to-diameter ratio or d/D).[20]

b) Existing Conditions

(1) Treatment Capacity

The City's wastewater treatment and conveyance system includes four wastewater treatment and water reclamation plants operated by LASAN. LASAN provides service within two service areas: the Terminal Island Service Area and the Hyperion Service Area. The Project Site is within the Hyperion Service Area.

The Terminal Island Service Area includes the TTP, which services the Harbor Area in the City of Los Angeles. The TTP has a treatment capacity of approximately 30 mgd and treats approximately 15 mgd of wastewater.

The Hyperion Service Area includes the HWRP in Playa del Rey, the TWRP in the City of Van Nuys, and the LAGWRP in the City of Los Angeles. The current treatment capacity of the Hyperion Service Area is approximately 550 mgd which consists of 450 mgd at HWRP, 80 mgd at TWRP, and 20 mgd at LAGWRP. The Project Site is located within the Hyperion Service Area, and its wastewater would be conveyed to and treated at the HWRP.[21]

20 City of Los Angeles LADPW Bureau of Engineering, Special Order No. 006-0691, Planning Period, Flow, and Design Criteria for Gravity Sanitary Sewers and Pumping Plants, effective June 6, 1991.

21 KPFF Consulting Engineers, Utility Technical Report, April 1, 2020, p. 3.

Typically, the TWRP and LAGWRP treat wastewater up to or near their capacities on most days. The HWRP is the City's primary water reclamation plant and one of the oldest and largest wastewater treatment facilities in the world. The HWRP provides preliminary, primary, and secondary treatment processes, and also treats wastewater flows bypassed from the TWRP and LADWRP. On average, 275 million gallons of wastewater enters the HWRP on a typical dry weather day. Because the amount of wastewater entering the HWRP can double on rainy days, the plant was designed to accommodate both dry and wet weather days with a maximum daily dry weather flow of 450 mgd and peak wet weather flow of 800 mgd.[22] As such, the HWRP's current remaining treatment capacity for dry weather flows is approximately 175 mgd on an average day.

Following the secondary treatment of wastewater, the majority of effluent from HWRP is discharged into Santa Monica Bay, while the remaining flows are conveyed to the West Basin Water Reclamation Plant for tertiary treatment and reuse as reclaimed water. The HWRP has two outfalls that presently discharge into the Santa Monica Bay, a one-mile outfall pipeline and five-mile outfall pipeline. Both outfalls are 12 feet in diameter. The one-mile outfall pipeline is 50 feet deep and is only used on an emergency basis. The five-mile outfall pipeline is 187 feet deep and is used to discharge secondary treated effluent on a daily basis.[23]

HWRP effluent is required to meet the Regional Water Quality Control Board's (RWQCB) requirements for a recreational beneficial use, which imposes performance standards on water quality that are equal to or more stringent than the standards required under the Clean Water Act permit administered under the system's National Pollution Discharge Elimination System (NPDES) permit. Accordingly, HWRP effluent to Santa Monica Bay is continually monitored by the City of Los Angeles Environmental Monitoring Division (EMD) to ensure that it meets or exceeds prescribed standards. The Los Angeles County Department of Health Services also monitors flows into the Santa Monica Bay.

(2) West Site

(a) Wastewater Generation

The northern part of the West Site is currently developed with an approximately 1,237-square-foot single-story building constructed in 1928, which is currently leased by the American Musical and Dramatic Academy (AMDA) and used on a daily basis for sets and prop storage. The remaining portion of the West Site (up to 78,512 square feet) contains a surface parking lot with a parking attendant kiosk. The AMDA-leased building currently uses minimal volumes of water.[24]

22 LASAN, Hyperion Water Reclamation Plant, https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=1186mdvh8u_393&_afrLoop=10107387348315793#!, accessed September 12, 2018.

23 LASAN, Hyperion Treatment Plant 5-Mile Outfall Inspection and Diversion to 1-Mile Outfall Fact Sheet, November 2006.

24 KPFF Consulting Engineers, Utility Technical Report, April 1, 2020, p. 2.

(b) Wastewater Collection

Within Yucca Street, between Ivar Avenue and Argyle Avenue, there is a 12-inch vitrified clay pipe (VCP) sewer line that flows westward. This 12-inch VCP sewer line has a capacity of 2.092 cubic feet per second (cfs), or 1,352,094 gallons per day (gpd).

Within Ivar Avenue, there are two VCP sewer lines between Yucca Street and Hollywood Boulevard. The easterly sewer line in Ivar Avenue is an 8-inch VCP sewer line that flows southward and has a capacity of 1.276 cfs to 1.679 cfs (824,700 gpd to 1,352,094 gpd), depending on the connecting line's point of entry. The westerly sewer line in Ivar Avenue is a 12-inch VCP that flows southward and has a capacity of 5.125 cfs to 5.806 cfs (3,312,374 gpd to 3,752,515 gpd), depending on the connecting line's point of entry.[25]

(3) East Site

(a) Wastewater Generation

The East Site is currently developed with the 114,043-square-foot Capitol Records Complex. However, the existing wastewater generation at Capitol Records Complex is not being affected by the Project.

(b) Wastewater Collection

Within Vine Street, between Yucca Street and Hollywood Boulevard, there is an 8-inch VCP that flows southward. This 8-inch VCP sewer line has a capacity of 1.538 cfs to 2.244 cfs (994,035 gpd to 1,450,335 gpd), depending on the connecting line's point of entry. In addition to the 12-inch VCP identified above, there is also an 8-inch VCP sewer line within Yucca Street, between Vine Street and Argyle Avenue, that flows westward.[26]

Within Argyle Avenue, there are two VCP sewer lines between Yucca Street and Hollywood Boulevard. The westerly sewer line along Argyle Avenue is an 8-inch VCP sewer line with a capacity of 1.836 cfs to 2.882 cfs (1,186,637 gpd to 1,862,685 gpd), depending on the connecting line's point of entry, and a terminal point located south of Yucca Street, flowing southward towards Hollywood Boulevard. The easterly sewer line along Argyle Avenue is an 8-inch VCP sewer line that collects flow from the existing sewer line along Carlos Avenue to the east and flows southward to connect to the westerly 8-inch VCP sewer line within Argyle Avenue. Since this easterly sewer line within Argyle Avenue is a collector line that collects wastewater flow off-site, it does not have a recorded flow capacity.[27]

25 KPFF Consulting Engineers, Utility Technical Report, April 1, 2020, pp. 4 and 5.

26 The 8-inch VCP sewer mains that are located in Yucca Street north of the Capitol Records Complex (to be protected in place) between Vine Street and Argyle Avenue is not included in the capacity discussion due to the sewer mains in this section being too far from the development on the East Site and any potential wye connections.

27 KPFF Consulting Engineers, Utility Technical Report, April 1, 2020, p. 5.

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to wastewater if it would:

Threshold (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;[28] or

Threshold (b): 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.

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold Questions. The factors to evaluate wastewater impacts include:

- The project would cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or
- The project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.

b) Methodology

All wastewater generation calculations were provided in the Utility Technical Report and are based on the LASAN sewage generation factors. The SCAR was generated for the Project with the East Site Hotel Option as it provided the most conservative wastewater generation calculations.

For conservative purposes, the analysis assumes no wastewater is currently generated at the Project Site, besides that already occurring at the Capitol Records Complex, which is not being affected by the Project. As such, wastewater from the Capitol Records

28 Electricity and natural gas are addressed in Section IV.O, *Energy Conservation and Infrastructure*, of this Draft EIR. Stormwater drainage is addressed in more detail in Section IV.G, *Hydrology and Water Quality*, of this Draft EIR. Telecommunications is addressed in more detail in Chapter VI, *Other CEQA Considerations*, of this Draft EIR.

Complex is not analyzed herein. All new sewer flows associated with the Project Site are considered an increase in wastewater generation.

The SCAR was generated for the Project with the East Site Hotel Option only as it provided the most conservative or highest wastewater generation scenario. To evaluate wastewater collection capacity, the LASAN reviewed the SCAR and evaluated the existing sewer system to determine the availability of adequate capacity to convey sewage to treatment facilities. A combination of flow gauging data and computed results from the City's hydrodynamic model were used to assess the potential for impacts on wastewater conveyance capacity due to additional sewer discharge from the Project.

In order to evaluate treatment capacity, the Project's estimated wastewater generation and projected average dry weather flow were compared with the available treatment capacity within the HWRP. Cumulative wastewater generation was compared with the available capacity of the HWRP using the average dry weather flow for 2015 and 2020, the latest projections available. While it is anticipated that future iterations of the IRP would provide for improvements to serve future population needs, it was conservatively assumed that no new improvements to the wastewater treatment plants would occur prior to the Project's buildout year of 2027. Based on this conservative assumption, wastewater generation would be compared with the projected available treatment capacity of the Hyperion Sanitary Sewer System of 550 mgd for 2027, the Project's buildout year.

c) Project Design Features

No specific Project Design Features are proposed with regard to wastewater.

d) Analysis of Project Impacts

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

Construction activities would be essentially the same under the Project and the Project with the East Site Hotel Option. Accordingly, Project-related construction impacts would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the construction impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

During operation, the Project and the Project with the East Site Hotel Option would result in different wastewater generation amounts. Therefore, a separate wastewater impact analysis is provided for the Project with the East Site Hotel Option. However, conclusions

regarding the impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

(1) Impact Analysis

(a) Construction Impacts

During construction of the Project, a negligible amount of wastewater would be generated by construction workers. However, any such wastewater generation would be temporary, only lasting as long as Project construction activities occur. It is anticipated that portable toilets would be provided by a licensed private vendor that would dispose of the wastewater off-site. Such wastewater generation is, therefore, anticipated to result in either no or negligible discharges to the City's wastewater treatment conveyance systems or treatment facilities and would not be discharged through any service connections at or near the Project Site. No such service connections would be established during Project construction to handle wastewater generated by construction workers. The minimal wastewater generation during construction would not require the construction of new or expansion of existing facilities, and, given their small amount, are not anticipated to exceed the capacity of existing wastewater conveyance and treatment systems.

Construction of the Project would include all necessary on- and off-site sewer pipe improvements and connections to adequately connect to the City's existing sewer system. Construction relative to the wastewater system for the Project would occur at the Project Site and immediate vicinity. Such activities would be confined to trenching to place the connections below the ground's surface and would be temporary in nature. The design of these connections would be developed by a registered engineer and approved by the BOE. If, during construction, existing sewer lines are found to be substandard or in deteriorated condition, the Project Applicant would be required to make necessary improvements to achieve adequate service under City's Building and Safety Code and the LADPW requirements. All necessary improvements would be verified through the permit approval process of obtaining a sewer connection permit from the City. Further, all construction activities that would happen in coordination with the appropriate agencies, including the LADPW, LASAN, and BOE. These agencies would provide input on the Project and would coordinate with the Project Applicant before, during, and after construction activities. This coordination would ensure that impacts would be less than significant. **Therefore, based on these factors, Project construction would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects, and impacts would be less than significant.**

(b) Operational Impacts

(i) Project

Table IV.N.1-2, *Wastewater Generation During Project Operation*, shows that the Project would generate approximately 311,680 gpd, or approximately 0.312 mgd. This estimate

does not account for reductions in wastewater generation that would result from required compliance with applicable LAMC requirements or the Project's water conservation measures, as presented in WS-PDF-1 in Section IV.N.2, *Water Supply*, of this Draft EIR.[29] As shown in Table IV.N.1-2, the total amount of wastewater generation for swimming pools is 126,727 gpd. This circumstance would occur only if the swimming pools were all drained on any given day. Daily wastewater generation for the swimming pools would typically be less than approximately 500 gallons per day. As such, this analysis is conservative in presenting the maximum wastewater generation scenario for swimming pools.

TABLE IV.N.1-2
WASTEWATER GENERATION DURING PROJECT OPERATION

Land Use	Units	Generation Rate (gpd/unit)[a]	Total Wastewater Generation (gpd)
Residential: Apartment – One-Bedroom Unit	482 du	110/du	53,020
Residential: Apartment – Two-Bedroom Unit	391 du	150/du	58,650
Residential: Apartment – Three-Bedroom Unit	132 du	190/du	25,080
Retail	16,882 sf	50/1,000 sf	844
Restaurant: Full Service Indoor Seat[b]	1,232 seats	30/seat	36,960
Office Building w/ Cooling Tower	7,971 sf	170/1,000 sf	1,355
Lounge[c]	23,916 sf	50/1,000 sf	1,196
Health Club/Spa	9,337 sf	650/1,000 sf	6,069
Cocktail Bar	2,470 sf	720/1,000 sf	1,778
Swimming Pools[d]	16,941 cf	7.4805/cf	126,727
		Total	**311,680[e]**

NOTES: du = dwelling units; sf = square feet, gpd = gallons per day, cf = cubic feet

[a] The generation rates are based on the LASAN sewerage generation factors.

[b] To calculate the number of seats, 1 seat per 15 sf was assumed.

[c] The lounge use includes a library, multipurpose rooms, kid rooms, and general amenity space.

[d] The swimming pool use includes a 21-cubic-foot water feature.

[e] Totals may not add up due to rounding.

SOURCE: ESA, 2020.

The Project's increase in wastewater generation of 0.312 mgd would represent approximately 0.057 percent of the Hyperion Sanitary Sewer System's estimated capacity

[29] As discussed in Section IV.N.2*, Water Supply*, a water supply assessment (WSA) was prepared for the Project. The WSA provides a higher level of detail by assigning subcategories to the Project's proposed uses and includes typical daily water demand for swimming pools, which allows for an accurate long-term water supply analysis. The Project's wastewater generation is appropriately based on the SCAR and conservatively assigns wastewater to a broader set of land use categories. This, along with the maximum daily swimming pools generation (assuming full drainage), allows for a conservative assessment of impacts to wastewater facilities.

of 550 mgd and approximately 0.069 percent of the HWRP's current design capacity of 450 mgd. As previously stated, the HWRP currently receives flows of approximately 275 mgd; this represents approximately 61 percent of its capacity and leaves approximately 175 mgd of remaining daily capacity. The Project's contribution of approximately 0.312 mgd of wastewater represents 0.18 percent of HWRP's remaining daily capacity of 175 mgd, which is a negligible increase in the wastewater volumes treated at the HWRP.

As required by LAMC Section 64.14, further detailed gauging and evaluation would be conducted as part of the normal permitting process to obtain final approval of sewer capacity and connection permits for the Project. In addition, Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. Furthermore, in accordance with LAMC Sections 64.11 and 64.16.1, the Project would pay the required sewer connection fees to help offset the Project's contribution to the City's wastewater collection infrastructure needs and would require approval of sewer permits prior to connection to the sewer system. Therefore, estimates of the Project's wastewater generation and the remaining capacity in the HWRP and Hyperion Sanitary Sewer System are considered conservative. Nonetheless, the calculations demonstrate that the HWRP and Hyperion Sanitary Sewer System would have available capacity to treat the Project's wastewater generation.

(ii) Project with the East Site Hotel Option

As indicated in **Table IV.N.1-3**, *Wastewater Generation During Project with the East Site Hotel Option Operation*, the Project with the East Site Hotel Option would result in a wastewater generation of approximately 322,067 gpd, or approximately 0.322 mgd. As with the calculations discussed above, this estimate does not account for reductions in wastewater generation that would result from required compliance with applicable LAMC requirements or the water conservation measures, as presented in Project Design Feature WS-PDF-1 in Section IV.N.2, *Water Supply*, of this Draft EIR.

The Project with the East Site Hotel Option's increase in wastewater generation of 0.322 mgd would represent approximately 0.059 percent of the Hyperion Sanitary Sewer System's estimated capacity of 550 mgd and approximately 0.07 percent of the HWRP's current design capacity of 450 mgd. As previously stated, the HWRP currently receives flows of approximately 275 mgd; this represents approximately 61 percent of its capacity and leaves approximately 175 mgd of remaining daily capacity. The Project with the East Site Hotel Option's contribution of approximately 0.322 mgd of wastewater represents 0.18 percent of HWRP's remaining daily capacity of 175 mgd, which is a negligible increase in the wastewater volumes treated at the HWRP.

Similar to the Project, the Project with the East Site Hotel Option would be required to pay the required sewer connection fees, pursuant to LAMC Sections 64.11 and 64.16.1, to

offset the Project's contribution to the City's wastewater collection infrastructure needs and would require approval of a sewer permit prior to connection to the sewer system. Therefore, estimates of the Project with the East Site Hotel Option's wastewater generation and the remaining capacity in the HWRP and Hyperion Sanitary Sewer System are considered conservative, and the HWRP and Hyperion Sanitary Sewer System would have available capacity to treat the Project with the East Site Hotel Option's wastewater generation.

TABLE IV.N.1-3
WASTEWATER GENERATION DURING THE PROJECT WITH THE EAST SITE HOTEL OPTION OPERATION

Land Use	Units	Generation Rate (gpd/unit)[a]	Total Wastewater Generation (gpd)
Residential: Apartment – 1-Bedroom Unit	411 du	110/du	45,210
Residential: Apartment – 2-Bedroom Unit	347 du	150/du	52,050
Residential: Apartment – 3-Bedroom Unit	126 du	190/du	23,940
Hotel	220 Rooms	120/room	26,400
Retail Area	16,248 sf	50/1,000 sf	812
Restaurant: Full Service Indoor Seat[b]	1,232 seats	30/seat	36,960
Office Building w/ Cooling Tower	7,925 sf	170/1,000 sf	1,347
Lounge[c]	20,500 sf	50/1,000 sf	1,025
Health Club/Spa	8,194 sf	650/1,000 sf	5,326
Cocktail Bar	2,470 sf	720/1,000 sf	1,778
Conference Rooms	4,082 sf	120/1,000 sf	490
Swimming Pools[d]	16,941 cf	7.4805/cf	126,728
		Total	**322,067[e]**

NOTES: du = dwelling units; sf = square feet, gpd = gallons per day, cf = cubic feet

[a] The generation rates are based on the LASAN sewerage generation factors.

[b] To calculate the number of seats, 1 seat per 15 sf was assumed.

[c] The lounge use includes a library, multipurpose rooms, kid rooms, and general amenity space.

[d] The swimming pool use includes a 21-cubic-foot water feature.

[e] Totals may not add up due to rounding.

SOURCE: KPFF Consulting Engineers, Utility Technical Report, April 1, 2020, pp. 12 and 13.

(iii) Conclusion

Therefore, the Project and the Project with the East Site Hotel Option would not require or result in the relocation or construction of new or expanded water or wastewater treatment facilities, the construction of which could cause significant environmental effects. Impacts would be less than significant.

(2) Mitigation Measures

Impacts regarding the relocation or construction of new or expanded wastewater treatment facilities were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding the relocation or construction of new or expanded wastewater treatment facilities were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (b): 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?

Construction activities would be essentially the same under the Project and the Project with the East Site Hotel Option. Accordingly, Project-related construction impacts would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the construction impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

During operation, the Project and the Project with the East Site Hotel Option would result in different wastewater generation amounts. However, the SCAR was generated for the Project with the East Site Hotel Option only as it provided the most conservative or highest wastewater generation scenario. However, conclusions regarding the impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

(1) Impact Analysis

(a) Construction Impacts

As previously discussed under Threshold (a), construction of the Project would generate a negligible amount of wastewater by construction workers. Any such wastewater generated would be temporary only lasting as long as Project construction activities occur. Any wastewater generation from Project construction activities would also not cause a measurable increase in wastewater flows requiring treatment at the HWRP. Lastly, construction workers typically utilize portable restrooms, which would be serviced by a licensed contractor who would dispose of wastewater off-site and would not contribute to wastewater flows to the local wastewater collection system. **Accordingly, the Project and Project with the East Site Hotel Option construction would result in a determination**

by HWRP, the wastewater treatment provider that would serve the Project or the Project with the East Site Hotel Option, that it has adequate capacity to serve the Project or the Project with the East Site Hotel Option's construction wastewater treatment demand, in addition to HWRP's existing commitments (i.e., existing customers in its service area). Therefore, impacts resulting from Project or the Project with the East Site Hotel Option construction would be less than significant.

(b) Operational Impacts

Sanitary sewer service to the Project Site from the surrounding streets is provided by LASAN. The wastewater treatment provider concluded in the SCAR that sufficient capacity exists within the City's sanitary sewer system serving the Project Site to accommodate wastewater generated as part of Project operation without constraining sewer capacity. As also discussed above under Subsection 2.b, Existing Conditions, there are existing sewer mains within Yucca Street, Ivar Avenue, Vine Street, and Argyle Avenue. The portion of the easterly 8-inch VCP within Ivar Avenue has a maximum capacity of 824,700 gpd (1.276 cfs).[30] Conveyance would not change upon Project buildout. Based on the SCAR results, the average daily wastewater flow of approximately 311,680 gpd would not exceed the design capacity of any existing sewer lines, and no sewer system improvements are necessary.[31]

Additionally, as detailed above, ample future capacity also exists at the HWRP, which would treat wastewater discharged from the Project Site, to handle Project wastewater flows. The SCAR, which uses the Project with the East Site Hotel Option as a worst-case scenario for peak wastewater demand and is provided in Exhibit 4 of the Utility Technical Report, allows for an increase of 322,067 gpd, or .322 mgd. The Project's maximum wastewater increase would be 311,680 gpd or .312 mgd, which is less than the maximum increase allowed by the SCAR.

Accordingly, the Project and the Project with the East Site Hotel Option operation would result in a determination by HWRP, the wastewater treatment provider that would serve the Project Site, that it has adequate capacity to serve the Project's and the Project with the East Site Hotel Option's operational wastewater treatment demand, in addition to HWRP's existing commitments. Therefore, operational impacts would be less than significant.

(2) Mitigation Measures

Impacts regarding capacity for wastewater treatment were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

30 KPFF Consulting Engineers, Utility Technical Report, April 1, 2020, p. 4.
31 KPFF Consulting Engineers, Utility Technical Report, April 1, 2020, p. 14.

(3) Level of Significance After Mitigation

Impacts regarding capacity for wastewater treatment were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

The Project and the Project with the East Site Hotel Option would result in different wastewater generation amounts. Therefore, a separate wastewater generation calculation is included in the impact analysis for the Project with the East Site Hotel Option. However, conclusions regarding the cumulative wastewater impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

(1) Impact Analysis

Chapter III, *Environmental Setting,* of this Draft EIR, identifies 150 related projects that are anticipated to be developed within the Project vicinity. Operation of these 150 related projects would cumulatively contribute, in conjunction with the Project, to wastewater generation in the Hyperion Service Area. For purposes of this analysis, wastewater generated by the related projects is assumed to be treated at the HWRP.

The Project and the Project with the East Site Hotel Option would result in less-than-significant impacts with regard to wastewater services and facilities. However, in this cumulative analysis, the Project with the East Site Hotel Option is considered since it provides the most conservative wastewater generation. As discussed above, operation of the Project with the East Site Hotel Option would generate approximately 322,067 gpd of wastewater, or 0.322 mgd, without a reduction for conservation measures.

As shown in **Table IV.N.1-4,** *Estimated Cumulative Wastewater Generation*, the estimated average wastewater dry weather flow generation associated with the related projects is up to 9,524,310 gpd or 9.524 mgd. As indicated, the Project with the East Site Hotel Option would contribute an additional 322,067 gpd or 0.322 mgd of average wastewater dry weather flow. The estimated generation for the Project with the East Site Hotel Option and the related projects would result in a combined total of approximately 9,846,377 gpd or 9.846 mgd of average wastewater dry weather flow. This represents approximately 5.6 percent of the HWRP's total remaining daily capacity of 175 mgd. These estimates do not account for reductions in wastewater generation that would occur with implementation of conservation measures for the related projects or the Project.

Accordingly, the Project's impacts, when considered together with the impacts of the related projects, would not result in a cumulatively considerable contribution to a significant cumulative impact related to wastewater treatment system capacity. Therefore, cumulative impacts would be less than significant.

TABLE IV.N.1-4
ESTIMATED CUMULATIVE WASTEWATER GENERATION

Land Uses	Quantity	Generation Factor[a]	Average Daily Wastewater Generated (gpd)[f]
Bar[a]	37.322 ksf	720 gpd/ksf	26,872
Coffee Shop[b]	29.364 ksf (2,937 seats)	25 gpd/seat	73,425
Commercial	199.640 ksf	50 gpd/ksf	9,982
Conference Room[c]	85.782 ksf	120 gpd/ksf	10,294
Health Club	26.5 ksf	650 gpd/ksf	17,225
Hotel	6,698 rooms	120 gpd/room	803,760
Medical Center	134.750 ksf	250 gpd/ksf	33,688
Museum	44.0 ksf	50 gpd/ksf	2,200
Office	6,962.086 ksf	170 gpd/ksf	1,183,555
Residential	16,092 du	150 gpd/du	2,413,800
Restaurant[d]	1,493.271 ksf (99,552 seats)	30 gpd/seat	2,986,560
Retail (< 100,000 sf)	771.739 ksf	50 gpd/ksf	38,587
Retail (> 100,000 sf)	869.119 ksf	25 gpd/ksf	21,728
Schools	557.6 students	11 gpd/stu	6,134
Storage	37.012 ksf	30 gpd/ksf	1,116
Theater[e]	5,686.148 ksf (631,795 seats)	3 gpd/seat	1,895,385
Subtotal Related Projects			**9,524,310 gpd**
Project with the East Site Hotel Option Subtotal			**322,067 gpd**
Related Projects Plus Project with the East Site Hotel Option Wastewater Generation Total			**9,846,377 gpd**

NOTES: ksf = thousand square feet; gpd = gallons per day; du = dwelling units

[a] All Bar uses use the Bar: Cocktail, Public Table Area factor.

[b] All coffee shops use the Coffee House: Services Prepared Food factor. Coffee shops assume each seat will occupy 10 square feet.

[c] Banquet Hall, Meeting Room, Youth and Senior Center, and Community Center uses use the Conference Room factor.

[d] All restaurant uses use the Restaurant: Full Service Outdoor Seat Factor. Restaurants assume each seat will occupy 15 square feet. Mixed Use and Other uses are combined into the Restaurant uses to be conservative.

[e] Theater, Special Events, Amphitheater, Park, Studio, Sound Stage, and Stage Support are included in the Theater subcategory and uses the Theater; Cinema factor. Theater assumes each seat occupies 9 square feet.

[f] Totals may not add up due to rounding.

SOURCE: ESA, 2020.

In regard to conveyance, these estimates assume that related projects within the City of West Hollywood would flow into similar sewage lines that would serve the Project Site. The City of West Hollywood has their own Sanitary Sewer Collection System, and the Los Angeles County Sewer Maintenance District provides the City of West Hollywood with limited services on a contractual basis.[32] The related projects located within the City of West Hollywood would be required to coordinate with the City of West Hollywood Department of Public Works to confirm that the respective project's conveyance could be served by the City of West Hollywood's sewer mainlines. The generated wastewater from the related projects within the City of West Hollywood would be conveyed, processed, and disposed of at HWRP.

The HWRP currently meets applicable water quality standards as set forth by its NPDES Permit.[33] Implementation of the SSMPs, upgrades in the advanced treatment processes at the treatment plants, and continual monitoring by the EMD would ensure that effluent discharged into Santa Monica Bay by the Project and related projects are within applicable limits. Accordingly, the Project's incremental impacts, when considered together with the impacts of the related projects, would not result in a cumulatively considerable contribution to a significant cumulative impact related to wastewater treatment requirements. Therefore, Project impacts on wastewater treatment requirements would not be cumulatively considerable, and cumulative impacts would be less than significant.

As with the Project and the Project with the East Site Hotel Option, all related projects would be subject to the provisions of the LAMC requiring provision of on-site infrastructure, improvements to address local capacity issues and payment of fees for future sewerage replacement and/or relief improvements. In particular, related projects would be subject to LAMC Section 64.15, which requires a determination by LADPW that there is sufficient sewer capacity available for each project. The City would continue to review new development projects to ensure that sewer capacity is available prior to the on-set of construction, and fees and mitigation included requirements to improve infrastructure if necessary to account for the project would be required. The preparation of a SCAR takes into account other recently approved SCARs, to evaluate the cumulative impact of all known SCARs on the sewer system. Also, in accordance with LAMC Section 64.11, the Project and the related projects would pay the required sewer connection fees to further assist in offsetting their contribution to City wastewater treatment infrastructure needs. **Therefore, impacts of the Project and Project with the East Site Hotel Option on the City's wastewater infrastructure would not be cumulatively considerable, and cumulative impacts would be less than significant.**

32 City of West Hollywood, Sewer System Management Plan.

33 California Regional Water Quality Control Board Los Angeles Region, U.S. Environmental Protection Agency Region IX, Order R4-2017-0045, NPDES No. CA0109991, Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit for the City of Los Angeles, Hyperion Treatment Plant Discharge to the Pacific Ocean.

(2) Mitigation Measures

Cumulative impacts regarding wastewater were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts regarding wastewater were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

IV. Environmental Impact Analysis

N.2 Water Supply

1. Introduction

This section evaluates the impacts of the Project on domestic water infrastructure and water supply. This section quantifies the Project's water demand and evaluates the ability of the local municipal water infrastructure and water supply to meet this demand. The Project's consistency with relevant plans and regulations regarding the provision of water is also discussed. The focus of this section is on water consumption for domestic use. For further discussion of water availability for firefighting (e.g., fire flow), see Section IV.K.1, *Public Services – Fire Protection*, of this Draft EIR.

The data and conclusions regarding water infrastructure in this section are based on the Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Utility Technical Report) prepared for the Project by KPFF Consulting Engineers, which is included as Appendix P-1 of this Draft EIR.[1] The data and conclusions in this section regarding the availability of water supply to serve the Project are based on a Water Supply Assessment (WSA) prepared for the Project by the Los Angeles Department of Water and Power (LADWP) and approved on December 11, 2018, by the City's Board of Water and Power Commissioners, included as Appendix P-2 of this Draft EIR.[2]

2. Environmental Setting

a) Regulatory Framework

(1) State

(a) California Urban Water Management Plan Act

The California Urban Water Management Planning Act (California Water Code [CWC] Division 6, Part 2.6, Sections 10610–10656) addresses several State policies regarding water conservation and the development of water management plans to ensure the efficient use of available supplies. The California Urban Water Management Planning Act also requires Urban Water Suppliers, such as the City, that serve more than 3,000 customers or provide more than 3,000 acre-feet per year (afy), to develop Urban Water Management Plans (UWMPs) every five years to identify short-term and long-term

[1] KPFF Consulting Engineers, *Hollywood Center Utility Infrastructure Technical Report: Water, Wastewater and Energy*, April 1, 2020. Provided in Appendix P-1 of this Draft EIR.

[2] Los Angeles Department of Water and Power (LADWP), *Water Supply Assessment (WSA) for the Hollywood Center Project*, December 11, 2018. Provided in Appendix P-2 of this Draft EIR.

demand management measures to meet growing water demands during normal, dry, and multiple-dry years.

(b) Senate Bill 610, Senate Bill 221, and Senate Bill 7

Two State laws addressing the assessment of water supply necessary to serve projects, Senate Bill (SB) 610 and SB 221, became effective on January 1, 2002. SB 610, codified in CWC Section 10910 et seq., describes requirements for WSAs applicable to the California Environmental Quality Act (CEQA) process and, defines the role UWMPs play in the WSA process. SB 610 requires that for projects subject to CEQA, which meet specific size criteria, the water supplier must prepare a WSA that determines whether the water supplier has sufficient water resources to serve the projected water demand associated with a proposed project, providing specific guidance regarding how future supplies are to be calculated where an applicable UWMP has been prepared. Specifically, a WSA shall identify existing water supply entitlements, water rights, or water service contracts held by the public water system, and prior years' water deliveries received by the public water system. In addition, the WSA must address water supplies over a 20-year period and consider normal, single-dry, and multiple-dry year conditions. In accordance with SB 610, projects for which a WSA must be prepared are those subject to CEQA that meet any of the following criteria:

- Residential developments of more than 500 dwelling units;
- Shopping centers or business establishments employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- Hotels, motels, or both, having more than 500 rooms;
- Industrial, manufacturing, or processing plants, or industrial parks planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area;
- Mixed-use projects that include one or more of the projects specified in this subdivision; or
- Projects that would demand an amount of water equivalent to or greater than the amount of water required by a 500-dwelling unit project.

The WSA must be approved by the public water supplier serving the project at a regular or special meeting and must be incorporated into the CEQA document. The lead agency must then make certain findings related to water supply based on the WSA.

In addition, under SB 610, a water supplier responsible for the preparation and periodic updating of an UWMP must describe the water supply projects and programs that may be undertaken to meet the total project water use of the service area. If groundwater is identified as a source of water available to the supplier, the following additional information must be included in the UWMP: (1) a groundwater management plan; (2) a

description of the groundwater basin(s) to be used and the water use adjudication rights, if any; (3) a description and analysis of groundwater use in the past five years; and (4) a discussion of the sufficiency of the groundwater that is projected to be pumped by the supplier.

In contrast to SB 610 WSAs, which are prepared at the beginning of the planning process for qualifying projects, SB 221 requires a Water Supply Verification (WSV) for large subdivision projects at the end of the planning process. Under SB 221, a water supplier must prepare and adopt a WSV indicating sufficient water supply is available to serve a proposed subdivision, or the local agency shall make a specified finding that sufficient water supplies are or will be available prior to completion of a project as part of the conditions for the approval of a final subdivision map. SB 221 specifically applies to residential subdivisions of 500 units or more. In addition, California Government Code Section 66473.7(i) exempts "[…] any residential project proposed for a site that is within an urbanized area and has been previously developed for urban uses; or where the immediate contiguous properties surrounding the residential project site are, or previously have been, developed for urban uses; or housing projects that are exclusively for very low and low-income households." SB 221 is codified in California Government Code Sections 11010, 65867.5, 66455.3, and 66473.7.

SB 7, which was part of the Seventh Extraordinary Session of 2009 and referred to as SB X7-7, was enacted on November 10, 2009. SB 7 mandates water conservation goals for UWMPs, requiring Urban Water Suppliers to achieve a 20 percent per capita water consumption reduction by the year 2020 statewide, as described in the "20 x 2020" State Water Conservation Plan.[3] As such, each updated UWMP must incorporate a description of how each respective Urban Water Supplier will quantitatively implement this water conservation mandate, which requirements in turn must be taken into consideration in preparing and adopting WSAs under SB 610.

(c) California Code of Regulations

(a) Title 20

Title 20, Sections 1605.1(h) and 1605.1(i) of the California Code of Regulations (CCR) establish efficiency standards (i.e., maximum flow rates) for all new federally-regulated plumbing fittings and fixtures, including such fixtures as showerheads, lavatory faucets, and water closets. Amongst the standards, the maximum flow rate for showerheads and lavatory faucets are 2.5 gallons per minute (gpm) at 80 pounds per square inch (psi) and 2.2 gpm at 60 psi, respectively. The standard for kitchen faucets is 2.2 gpm at 60 psi. The standard for water closets is 1.28 gallons per flush. In addition, Section 1605.3(h) establishes State efficiency standards for non-federally regulated plumbing fittings, including commercial pre-rinse spray valves.

[3] California State Water Resources Control Board (SWRCB), *20 x 2020 Water Conservation Plan*, February 2010.

(b) Title 24, Part 11

Part 11 of Title 24, the title that regulates the design and construction of buildings, establishes the California Green Building Standards (CALGreen) Code. The purpose of CALGreen Code is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices in the following categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. The CALGreen Code includes both mandatory measures and voluntary measures. The mandatory measures establish minimum baselines that must be met in order for a building to be approved. The voluntary measures can be adopted by local jurisdictions for greater efficiency.

(c) Emergency Declaration 1-17-2014 and Executive Orders B-29-15, B-36-15, B-37-16, and B-40-17

In response to California's drought conditions, on January 17, 2014, Governor Jerry Brown declared a State of Drought Emergency (Proclamation of a State of Emergency) and directed State officials to take necessary actions to reduce the impacts of the ongoing drought conditions that had been occurring in California since approximately 2009. The proclamation lists numerous actions, including calling upon local Urban Water Suppliers and municipalities to implement their local water shortage contingency plans immediately in order to avoid or forestall outright restrictions that could become necessary later in the drought season. It also directs them to update their legally required urban and agricultural water management plans to correspond with State water conservation measures to help plan for extended drought conditions.[4] In April 2014, Governor Brown issued a Proclamation of a Continued State of Emergency throughout the State in response to the ongoing drought.

On April 1, 2015, Governor Brown renewed his emergency declaration and issued Executive Order B-29-15, which imposed a mandatory 25-percent Statewide water reduction on potable water use by Urban Water Suppliers through February 28, 2016, as compared to the designated base year of 2013. Executive Order B-29-15 sought to prioritize water infrastructure projects, incentivize water efficiencies, and streamline permitting and approval processes for water transfers and emergency drinking water projects. Executive Order B-29-15 further directed agencies to adopt emergency regulations to improve the efficiency of water appliances.

In November 2015, Governor Brown issued Executive Order B-36-15, which called for additional actions to build on the State's response to record dry conditions and assist recovery efforts from devastating wildfires. These included extension of previous executive orders, prioritization of projects that enhance water conservation, support for

[4] State of California, Office of Governor Edmund G. Brown, Jr., Governor Brown Declares Drought State of Emergency, January 17, 2014, http://gov.ca.gov/news.php?id=18368, accessed December 24, 2018.

the extension of water restrictions, and support for projects that remediate wildfire damage and restore power plant operation. On May 9, 2016, Governor Brown issued Executive Order B-37-16 to continue water use restrictions from Executive Order B-29-15 as drought conditions continued to persist. While as of 2018 the severity of the drought has lessened in some parts of California after winter rains and snow, the drought is not currently over. The Executive Order called for long-term improvements to local drought preparation across the State, and directed the California State Water Resources Control Board (SWRCB) to develop proposed emergency water restrictions for 2017 if the drought persisted. The Executive Order is intended to achieve the following: use water more wisely, eliminate water waste, strengthen local drought resilience, and improve agricultural water use efficiency and drought planning.[5]

On May 18, 2016, SWRCB adopted a revised emergency water conservation regulation, effective June 2016 through Spring 2017. The regulation rescinded numeric reduction targets for Urban Water Suppliers, instead requiring locally developed conservation standards based upon each agency's specific circumstances.[6] On April 26, 2017, the SWRCB repealed part of the emergency regulation pertaining to water supply stress test requirements and remaining mandatory conservation standards for Urban Water Suppliers.[7] The repeal was in response to Executive Order B-40-17, discussed below.[8] The regulatory requirements resulting from these Executive Orders were codified in Article 22.5, Drought Emergency Water Conservation of the California Code of Regulations.

On April 7, 2017, Governor Brown issued Executive Order B-40-17 to end the drought state of emergency in all California counties, except Fresno, Kings, Tulare, and Tuolumne, where emergency drinking water projects continue to offset reduced groundwater supplies.[9] The Executive Order also rescinded Governor Brown's January 2014 and April 2014 drought-related emergency proclamations and four drought-related Executive Orders, including B-29-15 and B-36-15. Cities and water districts throughout the State are required to continue reporting their water use each month. The order continued the ban on wasteful practices, including hosing off sidewalks and running sprinklers when it rains.

5 State of California, Office of Governor Edmund G. Brown, Jr., Governor Brown Issues Order to Continue Water Savings as Drought Persists, May 9, 2016.

6 State of California Office of Administrative Law, Notice of Approval of Emergency Regulatory Action, State Water Resources Control Board, Title 23, May 31, 2016.

7 SWRCB, Emergency Conservation Regulation, 2017, https://www.waterboards.ca.gov/water_issues/programs/conservation_portal/emergency_regulation.html, accessed December 24, 2018.

8 SWRCB, Resolution No. 2017-0024, adopted on April 26, 2017.

9 LADWP, *WSA for the Hollywood Center Project*, December 11, 2018, p. 17. Provided in Appendix P-2 of this Draft EIR.

(d) California Water Plan

Required by CWC Section 10005(a), the California Water Plan is the state's strategic plan for managing and developing water resources statewide for current and future generations.[10] It provides a collaborative planning framework for elected officials, agencies, tribes, water and resource managers, businesses, academia, stakeholders, and the public to develop findings and recommendations and make informed decisions for California's water future.

The California Water Plan, updated every five years, presents the status and trends of California's water-dependent natural resources; water supplies; and agricultural, urban, and environmental water demands for a range of plausible future scenarios. The Water Plan also evaluates different combinations of regional and statewide resource management strategies to reduce water demand, increase water supply, reduce flood risk, improve water quality, and enhance environmental and resource stewardship. The evaluations and assessments performed for the plan help identify effective actions and policies for meeting California's resource management objectives in the near term and for several decades to come.

In June 2019, the California Department of Water Resources released up-to-date climate change information, including hydrologic impacts and projections at the statewide and regional levels and adaptation strategies, in the California Water Plan Update 2018 (California Water Plan).[11]

(e) California Water Action Plan

The California Water Action Plan was released in January 2014 and was updated in 2016 under Governor Brown's administration.[12] The California Water Action Plan discusses the challenges to water in California: uncertain water supplies, water scarcity/drought, declining groundwater supplies, poor water quality, declining native fish species and loss of wildlife habitat, floods, supply disruptions, and population growth and climate change further increasing the severity of these risks.[13] Ten actions are listed in the California Water Action Plan to address the pressing water issues that California faces while laying groundwork for a sustainable water future:[14]

1. Make conservation a California way of life.
2. Increase regional self-reliance and integrated water management across all levels of government.
3. Achieve the co-equal goals for the Delta.

[10] California Department of Water Resources, *California Water Plan*, https://water.ca.gov/Programs/California-Water-Plan, accessed December 24, 2018.
[11] California Department of Water Resources, *California Water Plan Update 2018*, June 2019, p. 2-13.
[12] California Natural Resources Agency, *California Water Action Plan 2016 Update*, January 14, 2016.
[13] California Natural Resources Agency, *California Water Action Plan 2016 Update*, January 14, 2016, pp. 2 and 3.
[14] California Natural Resources Agency, *California Water Action Plan 2016 Update*, January 14, 2016, p. 5.

4. Protect and restore important ecosystems.
5. Manage and prepare for dry periods.
6. Expand water storage capacity and improve groundwater management.
7. Provide safe water for all communities.
8. Increase flood protection.
9. Increase operational and regulatory efficiency.
10. Identify sustainable and integrated financing opportunities.

(2) Regional

(a) Metropolitan Water District's 2015 Urban Water Management Plan

The Metropolitan Water District's (MWD) 2015 Regional UWMP (2015 RUWMP) addresses the future of MWD's water supplies and demand through the year 2040.[15] Evaluations are prepared for average year conditions, single dry-year conditions, and multiple dry-year conditions. The analysis for multiple-dry year conditions (i.e., under the most challenging weather conditions such as drought and service interruptions caused by natural disasters) is presented in Table 2-4 of the 2015 RUWMP.[16] The analysis in the 2015 RUWMP concluded that reliable water resources would be continuously available to meet demand through 2040.[17] In the 2015 RUWMP, the projected 2040 demand for water is 2,201,000 afy, whereas the expected and projected 2040 supply is 2,941,000 afy based on current programs, and an additional 398,000 afy is expected to become available through programs under development for a potential surplus in 2040 of 1,138,000 afy.[18]

MWD has established comprehensive plans for stages of actions that would be undertaken to address up to a 50-percent reduction in its water supplies and a catastrophic interruption in water supplies through its Water Surplus and Drought Management and Water Supply Allocation Plans. MWD has also developed an Emergency Storage Requirement to mitigate against potential interruption in water supplies resulting from catastrophic occurrences within the Southern California region and is working with the State to implement a comprehensive improvement plan to address catastrophic occurrences that could occur outside of the Southern California region. MWD is also working with the State on the Delta Risk Management Strategy to reduce the impacts of a seismic event in the Delta that would cause levee failure and disruption of

15 Metropolitan Water District of Southern California (MWD), *2015 Urban Water Management Plan (RUWMP)*, June 2016.
16 MWD, *2015 RUWMP*, June 2016, p. 2-15.
17 MWD, *2015 RUWMP*, June 2016, p. 2-15.
18 MWD, *2015 RUWMP*, June 2016, p. 2-15.

State Water Project (SWP) deliveries. In addition, MWD has plans for supply implementation and continued development of a diversified resource mix, including programs in the Colorado River Aqueduct, SWP, Central Valley transfers, local resource projects, and in-region storage that enables the region to meet its water supply needs. As set forth in their 2015 RUWMP, MWD will also continue investments in water use efficiency measures to help the region achieve the SB X7-7 goal of 20 percent per person potable water use reduction by 2020.[19]

(b) MWD's 2015 Integrated Resources Plan

The MWD prepares an Integrated Water Resources Plan (IRP) to provide a water management framework that includes plans and programs for meeting future water needs. It addresses issues that can affect future water supply, such as water quality, climate change, and regulatory and operational changes. The most recent IRP (2015 IRP) was adopted in January 2016.[20] It establishes a water supply reliability mission of providing its service area with an adequate and reliable supply of high-quality water to meet present and future needs in an environmentally and economically responsible way. Among other topics, the 2015 IRP discusses water conservation, local and imported water supplies, storage and transfers, water demand, and adaptation to drought conditions. Specifically, the 2015 IRP includes the following strategies to meet future water demand:[21]

- Stabilizing and maintaining imported supplies;
- Meeting future growth through increase water conservation and the development of new – and protection of existing – local supplies;
- Pursuing a comprehensive transfers and exchanges strategy;
- Building storage in wet and normal years to manage risk and drought; and
- Preparing for climate change with Future Supply Actions – recycled water, seawater desalination, stormwater capture, and groundwater cleanup.

The 2015 IRP reliability targets identify developments in imported and local water supply, and in water conservation that, if successful, would provide a future without water shortages and mandatory restrictions under planned conditions. For imported supplies, MWD would make investments to maximize Colorado River Aqueduct deliveries in dry years. MWD would make ecologically sound infrastructure investments to the SWP so that the water system can capture sufficient supplies to help meet average year demands and to refill the MWD storage network in above-average and wet years.

Lowering regional residential per capita demand by 20 percent by the year 2020 (compared to a baseline established in 2009 State legislation), reducing water use by landscaping, and advancing additional local supplies are among the planned actions to

19 MWD, *2015 RUWMP*, June 2016, p. ES-5.
20 MWD, *Integrated Water Resources Plan 2015 Update (2015 IRP)*, Report No. 1518, January 2016.
21 MWD, *2015 IRP*, January 2016, p. 6.5.

keep supplies and demands in balance. Table ES-1, 2015 IRP Update Total Level of Average-Year Supply Targeted (Acre-Feet), of the 2015 IRP, shows the supply reliability and conservation targets. As presented in Table ES-1, the total supply reliability target for each five-year increase between 2016 and 2040 would exceed the retail demand after conservation. In 2040, retail demand after conservation is estimated to be 4,273,000 af and the total supply reliability target is approximately 4,539,000 af, representing an excess of 266,000 af.[22]

(c) MWD's Water Surplus and Drought Management Plan

In 1999, MWD incorporated the water storage contingency analysis that is required as part of any UWMP into a separate, more detailed plan, called the Water Surplus and Drought Management Plan. The overall objective of the Water Surplus and Drought Management Plan is to ensure that shortage allocation of MWD's imported water supplies is not required. The Water Surplus and Drought Management Plan provides policy guidance to manage MWD's supplies and achieve the goals laid out in the agency's IRP. The Water Surplus and Drought Management Plan separates resource actions into two major categories: Surplus Actions and Shortage Actions. The Water Surplus and Drought Management Plan considers the region to be in surplus only after MWD has met all demands for water, including replenishment deliveries. The Surplus Actions store surplus water, first inside, then outside of the region. The Shortage Actions of the Water Surplus and Drought Management Plan are separated into three subcategories: Shortage, Severe Shortage, and Extreme Shortage. Each category has associated actions that could be taken as part of the response to prevailing shortage conditions. Conservation and water efficiency programs are part of MWD's resource management strategy through all categories.

(d) MWD's Water Supply Allocation Plan

While the Water Surplus and Drought Management Plan included a set of general actions and considerations for MWD staff to address during shortage conditions, it did not include a detailed water supply allocation plan or implementation approach. Therefore, in February 2008, MWD adopted a water supply plan called the Water Supply Allocation Plan, which has since been implemented three times, most recently in April 2015. The Water Supply Allocation Plan includes a formula for determining reductions of water deliveries to member agencies during extreme water shortages in MWD's service area conditions (i.e., drought conditions or unforeseen cuts in water supplies).

The formula allocates shortages of MWD supplies and seeks to balance the impacts of a shortage at the retail level while maintaining equity on the wholesale level, and takes into account growth, local investments, changes in supply conditions and the demand hardening aspects of non-potable recycled water use and the implementation of conservation savings programs. The allocation period covers 12 consecutive months from July of a given year through the following June.

[22] MWD, *2015 IRP*, January 2016, p. VIII.

(3) Local

(a) City of Los Angeles General Plan Framework

The Citywide General Plan Framework Element (Framework Element) establishes the conceptual basis for the City's General Plan.[23] The Framework Element sets forth a comprehensive Citywide long-range growth strategy and defines Citywide policies regarding land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, infrastructure and public services. Chapter 9, Infrastructure and Public Services, of the Framework Element identifies goals, objectives, and policies for utilities in the City, including wastewater collection and treatment. Goal 9C is to provide adequate water supply, storage facilities, and delivery system to serve the needs of existing and future water needs.[24]

(b) Hollywood Community Plan

The Land Use Element of the City's General Plan is comprised of 35 Community Plans. The City's Community Plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use at the community level. The Community Plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The City's Community Plans implement the City's Framework Element at the local level. The City's Community Plans express the goals, objectives, policies, and programs to address growth within each of the individual communities and depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities. The Project is located within the Hollywood Community Plan area.

The Hollywood Community Plan was adopted in 1988 and addresses growth and the arrangement of land uses within its boundaries through the year 2010.[25] The Hollywood Community Plan does not provide specific policies for provision of water supply. However, it does provide general guidance for "service systems" and states that they shall be provided in a sequenced manner to provide a balance between land use and service facilities at all times. Service systems are defined as "public facilities" and while focusing on services, such as schools and libraries, but may also be inclusive of utilities.[26]

(c) Los Angeles Municipal Code (LAMC)

The City has adopted several ordinances to reduce the amount of water consumption in the City. These include measures pursuant to the City's green building efforts,

[23] City of Los Angeles Department of City Planning, *City of Los Angeles General Plan*, Citywide General Plan Framework, 1995.

[24] City of Los Angeles Department of City Planning, *City of Los Angeles General Plan*, Citywide General Plan Framework Element, Chapter 9: Infrastructure and Public Services – Water Supply, 1995.

[25] City of Los Angeles Department of City Planning, *Hollywood Community Plan*, adopted December 13, 1988, p. HO-2.

[26] City of Los Angeles Department of City Planning, *Hollywood Community Plan*, adopted December 13, 1988, pp. HO-5 and HO-6.

encouragement of sustainable development and initiatives to address potential water shortages due to changing supply availability. The ordinances are discussed below.

(a) Ordinance No. 180,822: Water Efficiency Requirements Ordinance

The Water Efficiency Requirements Ordinance, City Ordinance No. 180,822, effective December 1, 2009, established water efficiency requirements for new development and renovation of existing buildings, mandating installation of high efficiency plumbing fixtures in residential and commercial buildings.

(b) Ordinance Nos. 181,480, 182,849, and 184,248: Los Angeles Green Building Code

The City's Green Building Code, Ordinance No. 181,480, subsequently amended by Ordinance 182,849, creates a set of development standards and guidelines to further energy efficiency and the reduction of greenhouse gas emissions. It builds upon and sets higher standards than those incorporated in the 2016 Title 24 building energy efficiency standards (CALGreen Code). Amongst its provisions are efficiency standards regarding water consumption fixtures and appliances in new buildings. Additionally, Ordinance No. 184,248, effective June 6, 2016, sets further restrictive water efficiency standards for plumbing fixtures, such as 1.2 gpm and 1.8 gpm maximum for lavatory faucets and showerheads, respectively. The Green Building Code is implemented through the building permit review process, during which projects are evaluated for compliance with the required water conservation features.

(c) Ordinance No. 170,978: Landscape Ordinance

In 1996, Ordinance No. 170,978 amended LAMC Sections 12.40 through 12.43 to establish consistent landscape requirements for new projects within the City. This ordinance and its implementing guidelines require numerous water conservation measures in landscape, installation, and maintenance, including, but not limited to, the use of drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray; setting automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation; and watering less in the cooler months and during the rainy season. The ordinance also provides guidance intended to increase the "residence time of precipitation" within a given watershed.

(d) Ordinance Nos. 166,080, 183,608, and 184,250: Emergency Water Conservation Plan

The City's Emergency Water Conservation Plan, most recently updated on April 25, 2016, by Ordinance No. 184,250, would provide mandatory water consumption practices during times when the supply of water available for use is reduced due to such factors as weather conditions, groundwater levels, etc.[27] Ordinance Nos. 166,080, 181,288, 183,608, and

[27] City of Los Angeles, Ordinance No. 184,250, April 25, 2016.

184,250 all served to amend LAMC Chapter XII, Article 1 to clarify the prohibited uses of water and to modify water conservation requirements of the Emergency Water Conservation Plan. Ordinance No. 184,250 would increase fines for water wastewaters during times of severe drought. LADWP would also be required to assess the water use of residential customers in the highest water rate, Tier 4, to determine if their water consumption is excessive and to encourage conservation.

Pursuant to Ordinance No. 181,288, approved on August 28, 2010, LAMC Section 121.08 establishes varied water consumption limitations arranged by phase, whereby the level of restriction for each phase is tied to the level of water conservation required, whereby each successive phase creates additional restrictions on water use to address increasingly severe water shortage emergencies.[28] Water conservation measures include such restrictions as limited watering of hard surfaces and automobiles and rationed watering of landscaping. The phases, starting with the least stringent conservation measures at Phase I, provide varying degrees of watering prohibitions on LADWP customers. Phase II increases restrictions by measures such as prohibiting landscaping irrigation on any day other Monday, Wednesday, or Friday for odd-numbered street addresses and Tuesday, Thursday, or Sunday for even-numbered street addresses. Phase II also includes watering time restrictions based on the type of nozzle. Phase III increases the measures by further restricting watering days to only Monday for odd-numbered street addresses and Tuesday for even-numbered street addresses. Phase IV does not allow any landscape irrigation. Phase V allows the LADWP Board of Water and Power Commissioners to implement additional prohibited uses based on the water supply situation, and also applies all restrictions from the previous phases.

The Los Angeles City Council previously implemented Phase III restrictions of Ordinance No. 181,288 and the LADWP Board of Water and Power Commissioners adopted Shortage Year Rates as well in 2009.[29] Phase II restrictions were implemented in August 2010 and remain in effect today.

On January 20, 2014, LADWP issued a Statement Regarding Statewide Drought conditions.[30] The statement said that Los Angeles has prepared for the approximately five-year drought, pointing out Angelenos use less water per capita than residents of any major U.S. city with a population of over 1 million. According to the statement, LADWP and other Southern California water agencies have invested in water storage over the past decade; and together with a strong conservation program, these investments will allow the City to weather the current shortage. The statement asked residents to look for more ways to reduce their water use and take advantage of money saving rebates offered by LADWP, including rebates for the use of water efficient appliances and devices and replacement of water-thirsty lawns with California Friendly landscape. LADWP also

[28] City of Los Angeles, Ordinance No. 181,288, August 28, 2010.

[29] LADWP, Emergency Water Conservation Ordinance – Council meeting July 14, 2009, September 15, 2009.

[30] LADWP, LADWP Statement Regarding Statewide Drought Conditions, January 20, 2014, https://www.ladwpnews.com/ladwp-statement-regarding-statewide-drought-conditions, accessed December 24, 2018.

expanded its public outreach and education efforts to raise awareness about the dry year conditions and users' responsibility to use water wisely and in accordance with the City's Water Conservation Ordinance.

On October 14, 2014, Mayor Eric Garcetti issued Executive Directive 5, which directed that the City achieve the following goals: a 20-percent reduction in per capita potable water consumption by 2017; a reduction in LADWP purchase of imported potable water by 50 percent by 2024; and creation of an integrated strategy that increases local water supplies and improves water security in the context of climate change and seismic vulnerability.[31] The 2015 UWMP includes existing plans by LADWP to develop local water supplies to reduce reliance on purchased water in the future. These goals include increased stormwater capture, groundwater clean-up, recycled water, and conservation.

On July 21, 2015, the LADWP Board of Water and Power Commissioners adopted a Resolution recommending the Mayor and City Council consider a transition from Phase II to Phase III of City Ordinance No. 183,608's water conservation measures if either the Mayoral or SWRCB conservation mandates are not met on a monthly basis. In addition to the requirements of Phase I and II, Phase III would limit outdoor irrigation to no more than two days a week. On April 19, 2016, the City once again amended Ordinance No. 183,608 with Ordinance No. 184,250 (the Final Los Angeles Emergency Water Conservation Plan), which defined and added fines for unreasonable uses of water.

(e) Ordinance No. 184,130: Water Rate Ordinance

The City's Water Rate Ordinance, originally adopted in June 1995 and amended in March 2016 by Ordinance No. 184,130, restructured water rate schedules for single-dwelling units, multi-dwelling units, commercial, industrial, government, and other land uses.[32] The new water rate structures would provide investments for reliable infrastructure, encourage conservation, expand local water supply projects, reduce reliance on imported purchased water, and meet regulatory mandates concerning drinking water quality. In regard to regulations specific to the provision of water for purposes of fire protection, largely defined by the Fire Code (Chapter V, Article 7 of the LAMC), see Section IV.K.1, *Public Services – Fire Protection*, of this Draft EIR.

(d) Urban Water Management Plan

In accordance with the California Urban Water Management Planning Act, LADWP adopted the 2015 UWMP on June 7, 2016, which builds upon the goals and progress made in the 2010 UWMP and serves as the City's master plan for reliable water supply and resource management.[33] The UWMP details LADWP's efforts to promote the efficient use and management of its water resources. LADWP's UWMP used a service area-wide method in developing its water demand projections. This methodology does not rely on

[31] City of Los Angeles, Office of the Mayor, Executive Directive No. 5, Emergency Drought Response – Creating a Water Wise City, Issued October 14, 2014.

[32] City of Los Angeles, Ordinance No. 184,130, adopted June 1995 and amended March 2016.

[33] LADWP, 2015 UWMP, 2016, https://www.ladwp.com/cs/idcplg?IdcService=GET_FILE&dDocName=QOELLADWP005416&RevisionSelectionMethod=LatestReleased, accessed December 24, 2018.

individual development demands to determine area-wide growth. Rather, the growth in water use for the entire service area was considered in developing long-term water projections for the City to the year 2040. The driving factors for this growth are demographics, weather, and conservation. LADWP used anticipated growth in the various customer class sectors as provided by MWD who received projected demographic data from SCAG.

LADWP's 2015 UWMP addresses water demand drivers and forecasts through 2040. The 2015 UWMP includes a new water demand forecast called a modified unit use approach for the major categories of demand, namely, demographics, socioeconomics, conservation, weather, and non-revenue water. This forecast will allow the City to better understand water-use trends and develop effective conservation programs.

LADWP's 2015 UWMP also defines an evolving water supply portfolio that includes significant increases in both water conservation and local water supplies. It addresses confidence in the water supply by analyzing the uncertainties associated with climate change and integrating this analysis into water supply plans. Finally, it reinforces the need to address the water/energy nexus and continuing efforts to reduce carbon footprint. With its current water supplies, planned future water conservation, and planned future water supplies, LADWP has available supplies to meet all demands under all three hydrologic scenarios (hot and dry; warm and wet; and average) through the 25-year planning period covered by the UWMP.

(e) L.A.'s Green New Deal (Sustainable City pLAn 2019)

In April 2019, Mayor Eric Garcetti released L.A.'s Green New Deal (Sustainable City pLAn 2019). Rather than an adopted plan, the Green New Deal is a mayoral initiative that consists of a program of actions designed to create sustainability-based performance targets through 2050 that advance economic, environmental, and equity objectives. [34] The Sustainable City pLAn 2019 is the first four-year update to the City's first Sustainable City pLAn that was released in April 2015.[35] The Green New Deal includes a multi-faceted approach to developing a locally sustainable water supply to reduce reliance on imported water, reducing water use through conservation, and increasing local water supply and availability.

Towards that end, the Green New Deal establishes a number of targets to be met in order to support the Green New Deal vision:[36]

- Source 70 percent of Los Angeles water locally (compared to a 15 percent baseline during the July 2013 to June 2014 period) and capture 150,000 afy of stormwater by 2035;

[34] City of Los Angeles, *L.A.'s Green New Deal*, 2019.
[35] City of Los Angeles, *Sustainable City pLAn*, 2015.
[36] City of Los Angeles, *LA's Green New Deal*, 2019, pp. 46 to 49.

- Recycle 100 percent of all wastewater for beneficial reuse by 2035 (in contrast to a baseline value of 27 percent in fiscal year 2017-2018);
- Build at least 10 new multi-benefit stormwater capture projects by 2025 to improve local water quality and increase local water supply; 100 by 2035; and 200 by 2050;
- Reduce potable water use per capita by 22.5 percent by 2025; 25 percent by 2035; and maintain or reduce 2035 per capita water use through 2050; and
- Install or refurbish hydration stations at 200 sites, prioritizing municipally-owned building and public properties such as parks, by 2035.

b) Existing Conditions

(1) Water Infrastructure

Based on the Utility Technical Report prepared for the Project, LADWP maintains the water infrastructure that provides service connections to the Project Site. Six water lines are located in the vicinity of the Project Site.[37] There is a northerly 12-inch water line along Yucca Street between Argyle Avenue and Vine Street. There are two more water lines along Yucca Street between Vine Street and Ivar Street, which include an 8-inch northerly water line, and a 24-inch southerly water line. There is also a westerly 16-inch water line along Ivar Avenue between Yucca Street and Hollywood Boulevard; a westerly 24-inch water line along Vine Street between Yucca Street and Hollywood Boulevard; and a westerly 8-inch water line along Argyle Avenue between Yucca Street and Hollywood Boulevard.

(2) Water Demand

The portions of the Project Site that would be developed are largely vacant and not generating water demand. The northern part of the West Site contains an approximately 1,237-square-foot single-story building that is leased by the American Musical and Dramatic Academy (AMDA) and used on a daily basis for sets and prop storage associated with their performing arts school. Because the amount of water used in this building is minimal, and to provide a conservative analysis, it is assumed that there is no existing water demand from this use. The remaining part of the West Site (approximately 78,512 square feet) contains a surface parking lot with a parking attendant kiosk that does not use water. The East Site contains the 114,043 square-foot Capitol Records Complex, which, while it does have an existing water demand, would not be affected by the Project.[38] Thus, water demand from the Capitol Records Complex is not included or calculated herein as part of the Project Site. The remaining part of the East Site consists of asphalt surface parking with a parking attendant kiosk that does not use water. As such, for the purposes of this Draft EIR, it is assumed that there is currently no water used

[37] KPFF Consulting Engineers, *Utility Technical Report*, April 1, 2020, p. 3.
[38] KPFF Consulting Engineers, *Utility Technical Report*, April 1, 2020, p. 2.

on the Project Site, and that all new water demand associated with the Project is considered an increase in water demand generation.

(3) Water Supply

LADWP is responsible for providing water for the City and various parts of Culver City, South Pasadena, and West Hollywood. LADWP ensures that the delivered water quality meets applicable California health standards for drinking water. Water is supplied to the City from the following sources: Los Angeles Aqueducts (LAA), local groundwater, imported water from the MWD and recycled water. **Table IV.N.2-1**, *LADWP Water Supply*, summarizes LADWP water supplies from these sources over the last 10 years. As indicated therein, in 2017, LADWP had an available water supply of 510,835 afy, including 74 percent from the Los Angeles Aqueducts; three percent from groundwater; 22 percent from the MWD; and two percent from recycled water.[39]

TABLE IV.N.2-1
LADWP WATER SUPPLY (IN ACRE-FEET PER YEAR)

Year	Los Angeles Aqueducts	Local Groundwater	MWD	Recycled Water	Transfer, Spread, Spills, and Storage	Total
2007	127,392	88,041	439,353	3,595	-57	658,438
2008	148,407	64,604	427,422	7,048	1,664	647,817
2009	137,261	66,998	351,959	7,570	554	563,234
2010	251,126	68,346	205,240	6,900	-938	532,550
2011	357,752	49,915	119,481	7,708	-153	535,009
2012	166,858	59,109	326,122	5,965	1,182	556,873
2013	64,690	66,272	438,534	9,253	-2,404	581,153
2014	63,960	96,394	391,307	11,307	2,020	560,948
2015	33,244	80,155	378,539	9,829	430	501,337
2016	95,573	72,503	314,336	9,095	-981	492,487
2017	380,329	14,695	113,033	8,509	5,730	510,835

SOURCE: LADWP, WSA for the Hollywood Center Project, December 11, 2018, p. 27. Provided in Appendix P-2 of this Draft EIR.

Based on Table VI in the approved WSA for the Hollywood Center Project, there would be adequate water supply for the demands within the MWD service area from 2020 to 2040 based on an average weather year. LADWP's available water supply is generally equivalent

[39] The total percentages do not add up to 100 percent of the total LADWP water supply because the amounts from the respective sources do not take into account the transfer, spread, spills, and storage reductions that affect the total LADWP water supply availability.

to the demand from year to year, as LADWP purchases additional water from MWD only on an as-needed basis. These water sources are described in further detail below.

(a) Los Angeles Aqueducts (LAA)

Water from the LAA comes primarily from streams and groundwater originating from snowmelt runoff from the eastern Sierra Nevada Mountains. In response to varying hydrologic conditions, water supply from these sources can fluctuate yearly. The City holds water rights in the eastern Sierra Nevada where the LAA water supplies originate. Pursuant to various legislative enactments, regulations, and written agreements between LADWP and the Great Basin Unified Air Pollution Control District (GBUAPCD), LADWP's ability to export LAA water is impacted by water levels in Mono Lake and water commitments necessary to implement a dust mitigation program for Owens Lake; therefore, the LAA's supply to the City in recent years has been at less than historical averages.[40]

On November 14, 2014, the City and the GBUAPCD announced an agreement that defined and limited the full extent of future dust mitigation for LADWP concerning Owens Lake. The agreement also allows LADWP to use water-efficient and waterless dust mitigation measures. LADWP expects to save significant amounts of water available in coming years with implementation of the Owens Lake Master Project and other water conservation projects.[41]

Average deliveries of water from the LAA system have totaled approximately 111,293 afy from between fiscal year (FY) 2011/12 to 2015/2016.[42] During this period, the record low snow pack for the LAA watershed in the eastern Sierra Nevada was recorded on April 1, 2015. Supply conditions have changed drastically since 2015. Snowpack in the Eastern Sierra was at 203 percent of an average year on April 1, 2017. On March 20, 2017, Mayor Garcetti had proclaimed a state of local emergency for the LAA as a response to the snowpack levels in the Eastern Sierra. The proclamation was issued to assist LADWP in taking immediate steps to protect infrastructure and manage runoff in the Owens Valley including, but not limited to, protection of facilities and diversion of conveyance flows.[43] This state of emergency declaration has been lifted as of November 21, 2017.[44]

The average annual LAA delivery between 2015 and 2040, based on the 50-year average hydrology from FY 1961/62 to 2010/11, is expected to be approximately 278,000 afy and

40 LADWP, *WSA for the Hollywood Center Project*, December 11, 2018, p. 29. Provided in Appendix P-2 of this Draft EIR.

41 LADWP, *WSA for the Hollywood Center Project*, December 11, 2018, p. 29. Provided in Appendix P-2 of this Draft EIR.

42 LADWP, *WSA for the Hollywood Center Project*, December 11, 2018, p. 29. Provided in Appendix P-2 of this Draft EIR.

43 LADWP, *WSA for the Hollywood Center Project*, December 11, 2018, p. 29. Provided in Appendix P-2 of this Draft EIR.

44 City of Los Angeles, Office of the Mayor, Mayor Garcetti Lifts Owens Valley Emergency Declaration, November 21, 2017.

gradually decline to 267,000 afy due to expected reductions in snowpack caused by climate change. However, with anticipated completion of the Owens Lake Master Project by 2024, the projected LAA delivery may increase to 286,000 afy, which would offset most of the anticipated long-term losses.[45]

(b) Groundwater

LADWP extracts groundwater from the San Fernando, Sylmar, and Central groundwater basins.[46] LADWP holds adjudicated extraction rights in each of the groundwater basins, meaning the City has been allocated quantified annual pumping and groundwater storage rights in the basins. The San Fernando and Sylmar Basins are subject to the judgment in *City of San Fernando vs. City of Los Angeles*, which requires that pumping be reported to the court-appointed Upper Los Angeles River Area Watermaster. The Central Basin is also subject to a court judgment that requires that pumping be reported to the Water Replacement District of Southern California, which acts as the administrative body of the court-appointed basin Watermaster.

The San Fernando Basin underlies approximately 112,000 acres of land in the Upper Los Angeles River Area. The majority of LADWP's groundwater is extracted from the San Fernando Basin. The City has an annual pumping right of 87,000 acre-feet in the San Fernando Basin and has accumulated 523,529 af of stored water credits in the basin as of October 1, 2016.[47] The Sylmar Basin, located in the northern part of the Upper Los Angeles River Area, overlies 5,600 acres of land. LADWP's current annual entitlement per the latest Sylmar Safe Yield is 3,570 afy. The Sylmar Basin production is anticipated to increase to 4,170 afy from fiscal-year ending (FYE) 2018 to 2033 to utilize groundwater the City has accumulated into storage, and then return to the entitlement of 3,570 afy in FYE 2034.[48] The City also holds a right to 17,236 afy from the Central Basin and holds additional storage rights in that basin.[49]

The supplies of groundwater in recent years, as well as projections through 2040, are shown in **Table IV.N.2-2**, *Local Groundwater Basin Supply.* For the July 2015 to June 2016 timeframe, LADWP extracted 73,898 af and 683 af from the San Fernando and Central Basins, respectively, with no water extracted from the Sylmar Basin.[50] LADWP plans to continue production from its groundwater basins in the coming years to offset reductions in imported supplies. However, extraction from the basins may be limited by water quality, sustainable pumping practices, and groundwater elevation. Future

[45] LADWP, *WSA for the Hollywood Center Project*, December 11, 2018, p. 29. Provided in Appendix P-2 of this Draft EIR.
[46] Currently, LADWP does not exercise its pumping rights at the West Coast Basin due to localized water quality issues.
[47] LADWP, *WSA for the Hollywood Center Project*, December 11, 2018, p. 30. Provided in Appendix P-2 of this Draft EIR.
[48] LADWP, *WSA for the Hollywood Center Project*, December 11, 2018, p. 30. Provided in Appendix P-2 of this Draft EIR,
[49] LADWP, *WSA for the Hollywood Center Project*, December 11, 2018, p. 30. Provided in Appendix P-2 of this Draft EIR.
[50] LADWP, *WSA for the Hollywood Center Project*, December 11, 2018, p. 30. Provided in Appendix P-2 of this Draft EIR.

projections for groundwater extraction at five-year intervals are also shown in Table IV.N.2-2. As indicated, the expected extraction for the San Fernando, Sylmar, and Central Basins in the years leading up to and inclusive of 2040 is 92,000 afy, 3,570 afy, and 18,500 afy, respectively.

TABLE IV.N.2-2
LOCAL GROUNDWATER BASIN SUPPLY (IN ACRE-FEET)

Fiscal Year (July-June)	San Fernando	Sylmar	Central
Recent Years			
2012–2013	50,550	1,952	6,310
2013–2014	68,784	891	9,727
2014–2015	80,097	1	6,948
2015–2016	75,958	683	8,395
2016–2017	55,116	0	3,005
2017–2018	22,259	0	0.77
Future Projections[a]			
2019–2020	90,000	4,170	18,500
2024–2025	88,000	4,170	18,500
2029–2030	84,000	4,170	18,500
2034–2035	92,000	4,170	18,500
2039–2040	92,000	3,570	18,500

[a] Future projections are based on LADWP, *2015 UWMP*, 2016, Exhibit 6I.

SOURCE: LADWP, WSA for the Hollywood Center Project, December 11, 2018, p. 31. Provided in Appendix P-2 of this Draft EIR.

(c) Metropolitan Water District of Southern California

MWD is comprised of 26 member agencies, which includes the City. MWD is the largest imported wholesaler water service provider for domestic and municipal uses in Southern California. MWD's primary water supply resources are the Colorado River and the SWP. All of MWD's 26 member agencies have preferential rights to purchase water from MWD. As of June 30, 2016, LADWP has a preferential right to purchase 19.94 percent of MWD's total annual water supply. MWD meets the demand for water through assessments of future supply and demand, which are presented in the MWD's RUWMP, which are reports that by statute must be prepared every five years.

The most recent report was the previously discussed 2015 RUWMP.[51] The 2015 RUWMP projects and plans for MWD's water supplies and demand through the year 2040.

[51] MWD, *RUWMP*, June 2016.

Evaluations are prepared for average year conditions, single dry-year conditions, and multiple dry-year conditions. The analysis for multiple dry-year conditions (i.e., under the most challenging weather conditions, such as drought and service interruptions caused by natural disasters) is presented in Table 2-4 of the 2015 RUWMP.[52] In the 2015 RUWMP, the projected 2040 demand water is 2,201,000 afy, whereas the projected 2040 supply is 2,941,000 afy based on current programs, and an additional 398,000 afy will become available under programs under development for a potential surplus in 2040 of 1,138,000 afy.[53]

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to water supply if it would:

Threshold (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 telecommunication facilities, the construction of which would cause significant environmental effects;[54] or

Threshold (b): Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions. The factors to evaluate water supply impacts include:

- The total estimated water demand for the project;
- Whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout;
- The amount by which the project would cause the projected growth in population, housing, or employment for the Community Plan area to be exceeded in the year of project completion; and
- The degree to which scheduled water infrastructure or project design features would reduce or offset service impacts.

52 MWD, *RUWMP*, June 2016, p. 2-15.

53 MWD, *RUWMP*, June 2016, p. 2-15.

54 Electrical and natural gas are addressed in Section IV.O, *Energy Conservation and Infrastructure*, of this Draft EIR. Stormwater drainage is addressed in more detail in Section IV.G, *Hydrology and Water Quality*, of this Draft EIR. Telecommunications is addressed in more detail in Chapter VI, *Other CEQA Considerations*, of this Draft EIR.

b) Methodology

(1) Water Infrastructure

The analysis of impacts to water infrastructure is based on the analysis in the Utility Technical Report (included as Appendix P-1 of this Draft EIR). The analysis: (1) identifies the domestic water mains that would serve the Project; (2) identifies the capacity and water pressures in these mains based on flow tests (e.g., Service Advisory Reports [SARs]) performed by LADWP (included as Exhibit 3 of the Utility Technical Report); and (3) determines whether the subject water mains have the capacity to serve the Project based on the capacity in these mains allotted to the Project by LADWP in the SARs. LADWP performed a flow test to determine if available water conveyance infrastructure (e.g., pipes, hydrants, and mains) exists to support future development. LADWP's approach consists of data ranging from available static pressure, which is the amount of pressure available at the source before applying the Project's demand; residual pressure, which is the amount of pressure exerted on the pipe when water is flowing through it; and the flow rate (gpm) through the hydrants at 20 psi.

In regard to fire hydrant flow, LADWP performed a hydraulic analysis of their water system to determine if adequate fire flow is available to the fire hydrants surrounding the Project Site. LADWP's approach consists of analyzing their water system model in the vicinity of the Project Site. Based on the results in the Information of Fire Flow Availability Request (IFFAR) in Exhibit 2 of the Utility Technical Report, provided in Appendix P-1 of this Draft EIR, LADWP determines whether it can meet the projected fire hydrant flow needs based on existing infrastructure through an Information of Fire Flow Availability Request (IFFAR). Impacts regarding the adequacy of water infrastructure for fire-fighting purposes are addressed in Section IV.K.1, *Public Services – Fire Protection*, of this Draft EIR.

(2) Water Supply

Per Section 10912 of the CWC, a WSA is required for the Project. The Project would include the development of 1,005 residential dwelling units and 30,176 square feet of restaurant/retail uses. The Project with the East Site Hotel Option would replace 104 residential units with a hotel, resulting in 884 residential dwelling units, a 220-room hotel, and 30,176 square feet of restaurant/retail uses. Therefore, a WSA is required and has been prepared for the Project and the Project with the East Site Hotel Option.[55] The approved WSA for the Hollywood Center Project considers both the Project and the Project with the East Site Hotel Option when estimating the domestic water demand.

As required by CWC Section 10912, the Project's water demand was calculated to determine if the Project's water demand is within the projections of the 2015 UWMP and whether sufficient water supply is available to meet the Project's demand. As discussed above, because there is limited current demand within the Project Site, it is assumed that

[55] LADWP, *WSA for the Hollywood Center Project*, Board Letter Approval, p. 1. Provided in Appendix P-2 of this Draft EIR.

any water demand generated by the Project would be the total increase in water demand by the Project Site. LADWP calculates the base water demand for the Project by multiplying the proposed land uses by the appropriate LASAN Sewer Generation rates. The total increase in water demand is then calculated by subtracting the water savings to be achieved through compliance with water conservation requirements (e.g., City Ordinance No. 184,248, 2017 Los Angeles Plumbing Code, and 2017 Los Angeles Green Building Code) also in addition to the Project's conservation measures (reflected in Project Design Feature WS-PDF-1 below).[56] The resulting total demand for water associated with the Project is then analyzed relative to LADWP's existing and planned future water supplies to determine if LADWP can accommodate the Project's water demands during average, single-dry, and multiple-dry years hydrologic conditions.

c) Project Design Features

Refer to Project Design Feature TRAF-PDF-2 (Construction Traffic Management Plan) in Section IV.L, *Transportation*, of this Draft EIR. In addition, based on the commitments by the Applicant to the LADWP (included as Appendix B of the approved WSA for the Hollywood Center Project) regarding specific design features to conserve water and reduce Project water demand, the following Project Design Feature related to water supply will be implemented as part of the Project:[57]

WS-PDF-1: Water Conservation Features. The Project will provide the following specific water efficiency features:

- ENERGY STAR Certified Residential Clothes Washers – Front-loading, capacity of 4.5 cubic feet, with Integrated Water Factor of 2.8.
- ENERGY STAR Certified Commercial Clothes Washers – Front-loading, capacity of 4.5 cubic feet, with Integrated Water Factor of 2.8.
- ENERGY STAR Certified Residential Dishwashers – Standard with 3.2 gallons/cycle.
- High-Efficiency Toilets (dual flush) with a flush volume of 0.8 gallons per flush for liquid waste and 1.28 gallons per flush for solid waste. Per Ordinance No. 180,822, Section 125,02, the toilets would have an effective flush volume of 0.96 gallons per flush.
- Install a meter on the pool make-up line so water use can be monitored and leaks can be identified and repaired.
- Landscaping – Approximately 52 percent of the total proposed landscaping is classified as low water use. Approximately 18 percent of the total proposed landscaping is classified as very low water use, which is considered drought-

[56] LADWP, *WSA for the Hollywood Center Project*, December 11, 2018, pp. 13 and 14. Provided in Appendix P-2 of this Draft EIR.

[57] LADWP, *WSA for the Hollywood Center Project*, December 11, 2018, pp. 4 and 5. Provided in Appendix P-2 of this Draft EIR.

tolerant enough to require no irrigation by Model Water Efficient Landscape Ordinance.

- Leak Detection System for swimming pools and Jacuzzi.
- Overhead spray (8 percent) and drip irrigation (92 percent) for landscaped areas.
- Pool splash troughs around the perimeter that drain back into the pool.
- Proper Hydro-zoning/Zoned Irrigation.
- Reuse pool backwash water for irrigation.
- Water-Saving Pool Filter.
- Waterless urinals for commercial uses.

d) Project Impacts

Threshold (a): Would the Project require or result in the relocation or construction of new or expanded water facilities, the construction of which would cause significant environmental effects?

Construction activities would be essentially the same under the Project and the Project with the East Site Hotel Option. Accordingly, Project-related construction impacts would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the construction impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

During operation, the Project and the Project with the East Site Hotel Option would require similar domestic water infrastructure and fire flow infrastructure. The SARs and fire flow availability reports for the Project cover the Project and the Project with the East Site Hotel Option. Accordingly, Project-related operational impacts would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the operational impact analysis and impact significance presented below are the same and also apply to the Project and the Project with the East Site Hotel Option.

(1) Impact Analysis

(a) Construction Impacts

Construction would result in an intermittent demand for water during demolition, excavation, grading, and construction activities on-site, including but not limited to use in dust control, cleaning of equipment, excavation/export, removal and re-compaction, and other related activities. Based on a review of construction projects of similar size and duration, a conservative estimate of construction water use ranges from 1,000 to 2,000 gpd for both the sequential and overlapping scenarios for the Project and the Project with

the East Site Hotel Option.[58] Considering temporary construction water use would be substantially less than the Project's water consumption during operation (as further detailed below and as estimated to be approximately 163,098 gpd for the Project, 182,895 gpd for the Project with the East Site Hotel Option), the existing water infrastructure would meet the limited and temporary water demand necessary for construction of the Project.

The Project would only require new connections from existing facilities and would not be required to construct new distribution lines. Construction impacts associated with the required connections would primarily involve trenching in order to place the water distribution lines below the surface and would be limited to on-site water distribution and minor off-site work associated with connections from the new buildings on the Project Site to the public mains. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all lines, LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service.[59] As discussed in Section IV.L, *Transportation,* of this Draft EIR, in accordance with Project Design Feature TRAF-PDF-2, the Project will implement a Construction Traffic Management Plan to reduce temporary pedestrian and traffic impacts during construction, including construction of water distribution lines and connections to the public main.

Therefore, Project construction would not require or result in the relocation or construction of new or expanded water facilities, the construction of which would cause significant environmental effects. **Construction impacts under the Project or the Project with the East Site Hotel Option on water infrastructure would be less than significant.**

(b) Operational Impacts

Water service to the Project Site would continue to be provided by LADWP, as under existing conditions. When analyzing the Project for infrastructure capacity, the projected demands for both fire suppression and domestic water are considered. Although domestic water demand is the Project's main contributor to water consumption, fire flow demands have a much greater instantaneous impact on infrastructure and are, therefore, the primary means for analyzing infrastructure capacity. Nonetheless, both fire suppression and domestic water flow analyses have been completed by LADWP for the Project.

In regard to fire hydrant flow, LADWP performed a hydraulic analysis of their water system to determine if adequate fire flow is available to the fire hydrants surrounding the Project Site. LADWP's approach consists of analyzing their water system model in the vicinity of the Project Site. Based on the results of the IFFAR, provided in Exhibit 2 of the Utility Technical Report, and four SARs (two for the West Site and two for the East Site), provided in Exhibit 3 of the Utility Technical Report, the existing public water infrastructure has sufficient capacity to meet both the projected fire and domestic water demands of the Project.[60]

[58] KPFF Consulting Engineers, *Utility Technical Report*, April 1, 2020, p. 6.
[59] KPFF Consulting Engineers, *Utility Technical Report*, April 1, 2020, pp. 6 and 7.
[60] KPFF Consulting Engineers, *Utility Technical Report*, April 1, 2020, p. 14.

Therefore, while the Project or the Project with the East Site Hotel operation would require new connections from existing facilities, with regulatory compliance with LAMC and coordination with LADWP, the Project or the Project with the East Site Hotel Option operation would not result in the relocation or construction of new or expanded water facilities, the construction or relocation of which would cause significant environmental effects. Operational impacts on water infrastructure would be less than significant.

(2) Mitigation Measures

Impacts on the relocation or construction of new or expanded water supply facilities were determined to be less than significant without mitigation; therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (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?

Construction activities would be essentially the same under the Project and the Project with the East Site Hotel Option. Accordingly, Project-related construction impacts would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the construction impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

During operation, the Project and the Project with the East Site Hotel Option would result in different water demand amounts. Therefore, a separate water supply impact analysis is provided for the Project with the East Site Hotel Option. However, conclusions regarding the impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

(1) Impact Analysis

(a) Construction Impacts

As stated under Threshold (a), water would be required for Project construction activities, such as dust control, cleaning of equipment, excavation/export, removal and re-compaction, and other related activities. Construction activities would be intermittent, with demand for water consumption variable but generally temporary in nature. As stated above and in the Utility Technical Report, based on a review of construction projects of similar size and duration, a conservative estimate of construction water demand would

be approximately 1,000 to 2,000 gpd over the duration of construction.[61,62] Construction water use of approximately 2,000 gpd would be substantially less than the Project's approved water consumption during long-term operation (as explained below). Considering temporary construction water use would be substantially less than the approved water consumption at the Project Site, there would be sufficient water supplies available to serve the Project Site during construction.

Furthermore, as described further below, the approved WSA for the Hollywood Center Project determined that adequate water supplies exist to meet the Project's projected water demand between 2015 and 2040, in addition to the existing and planned future demands for normal, single-dry, and multiple-dry years on LADWP.[63] As Project construction would require a nominal amount of water compared to Project operation, and construction would be completed by 2025 if construction of the East and West Sites overlapped or by 2027 if construction did not overlap, the Project's intermittent construction-related water demand can be met by LADWP's available water supplies during each year of construction through 2040. For these reasons, adequate water supplies would be available from existing entitlements and resources for Project construction activities. **Therefore, LADWP has sufficient water supplies to serve the Project and the Project with the East Site Hotel Option and reasonably foreseeable future development during normal, dry, and multiple-dry years, and impacts on water supply during construction would be less than significant.**

(b) Operational Impacts

As indicated under the Existing Conditions above, water demand associated with the Project under this analysis is considered new water demand.

(a) Project

Estimated domestic water demand for the Project, as determined in the approved WSA for the Hollywood Center Project, is shown in **Table IV.N.2-3**, *Estimated Project Water Demand*.

As indicated in Table IV.N.2-3, the Project would result in a total increase in domestic water demand of an estimated 163,098 gpd or 182.71 afy. This estimate takes into account regulatory required water conservation features and the additional water conservation features of the Project in the approved WSA for the Hollywood Center Project (e.g., Project Design Feature WS-PDF-1), which together would account for 39.0 percent of the base demand of 267,508 gpd.[64]

61 KPFF Consulting Engineers, *Utility Technical Report*, April 1, 2020, p. 6.

62 The high end of this range is used here to provide a conservative analysis.

63 LADWP, *WSA for the Hollywood Center Project*, December 11, 2018, p. 5. Provided in Appendix P-2 of this Draft EIR.

64 The required water conservation features would reduce the water demand by 97,936 gpd. Project Design Feature WS-PDF-1 would reduce water demand by 6,474 gpd. Together (104,410 gpd), they would account for 39.0 percent of the base demand of 267,508 gpd.

TABLE IV.N.2-3
ESTIMATED PROJECT WATER DEMAND

Proposed Uses	Quantity	Water Use Factor (gpd/unit)[a]	Base Demand (gpd)	Water Efficiency Requirements Ordinance Savings (gpd)[b]	Proposed Water Demand (gpd)	Proposed Water Demand (afy)
West Site						
1 BR Market-Rate	195 du	110/du	21,450			
2 BR Market-Rate	198 du	150/du	29,700			
3 BR Market-Rate	56 du	190/du	10,640			
1 BR Senior Affordable	59 du	110/du	6,490			
2 BR Senior Affordable	9 du	150/du	1,350			
East Site						
1 BR Market-Rate	175 du	110/du	19,250			
2 BR Market-Rate	172 du	150/du	25,800			
3 BR Market-Rate	76 du	190/du	14,440			
1 BR Senior Affordable	53 du	110/du	5,830			
2 BR Senior Affordable	12 du	150/du	1,800			
Base Demand Adjustment (Residential Units)[c]			16,413			
Residential Units Total	***1,005 du***		***153,163***	***36,142***	***117,021***	***131.09***
West Site						
Market-Rate						
Lobby	7,535 sf	50/ksf	377			
Health Club	5,784 sf	650/ksf	3,760			
Office	3,957 sf	120/ksf	475			
Lounge	14,047 sf	50/ksf	702			
Bar	2,470 sf	720/ksf	1,778			
Senior Affordable						
Lobby	1,287 sf	50/ksf	64			
Lounge	1,895 sf	50/ksf	95			
East Site						
Market-Rate						
Lobby	6,521 sf	50/ksf	326			
Health Club	3,553 sf	650/ksf	2,309			
Office	4,014 sf	120/ksf	482			
Lounge	9,369 sf	50/ksf	468			
Senior Affordable						
Lobby	1,839 sf	50/ksf	92			
Lounge	2,000 sf	50/ksf	100			
Indoor Amenities Total			***11,028***	***3,547***	***7,481***	***8.38***

TABLE IV.N.2-3
ESTIMATED PROJECT WATER DEMAND

Proposed Uses	Quantity	Water Use Factor (gpd/unit)[a]	Base Demand (gpd)	Water Efficiency Requirements Ordinance Savings (gpd)[b]	Proposed Water Demand (gpd)	Proposed Water Demand (afy)
Restaurant[d]	1,232 seats	30/seat	36,960			
Commercial Total			***36,960***	***4,890***	***32,070***	***35.93***
West Site						
Spa	240 sf		23			
Pool	2,240 sf		210			
East Site						
Spa	125 sf		12			
Pool	1,625 sf		153			
Outdoor Common Space			***397***	***0***	***397***	***0.44***
Landscaping[e]	**23,844 sf**		**2,227**	**1,007**	**1,220**	**1.37**
Covered Parking[f]	**676,111 sf**	**0.02/sf**	**445**	**0**	**445**	**0.50**
Cooling Tower Total	**2,925 tons**	**21.64**	**63,288**	**52,350**	**10,938**	**12.25**
Proposed Subtotal			**267,508**	**97,936**	**169,572**	**189.96**
Less Existing Uses to Be Removed					0	0.00
Less Additional Conservation[g]					-6,474	-7.25
Additional Water Demand for Project					**163,098**	**182.71**

BR = bedroom; du = dwelling unit; sf = square feet; ksf = 1,000 square feet; gpd = gallons per day; afy = acre-feet per year

[a] Water Use Factor is based on City's Department of Public Works, LASAN sewer generation rates. The land uses listed in this table are reflective of the categories used by LASAN.

[b] The Project's land uses would conform to the City's Ordinance No. 184,248, 2017 Los Angeles Plumbing Code, and the 2017 Los Angeles Green Building Code.

[c] Base Demand Adjustment is the estimated savings due to Ordinance No. 180,822 accounted for in the current version of the LASAN sewer generation rates.

[d] 30,176 square feet (12,691 square feet for the West Site and 17,485 square feet of the East Site) of the proposed Restaurant/Retail uses are assumed to be all full service restaurant for a conservative estimate. The proposed restaurant scope includes dining areas in the Outdoor Common Space. The number of seats provided is based on design estimates regarding the number of seats that can fit inside of the restaurant/retail areas.

[e] Landscaping water use is estimated per California Code of Regulations Title 23, Division 2, Chapter 2.7, Model Water Efficient Landscape Ordinance.

[f] Auto parking water uses are based on City of Los Angeles Department of Public Works, LASAN Sewer Generation Rates table, and assumes 12 times/year cleaning.

[g] Water conservation due to conservation commitments, as detailed on page 13 of the approved WSA for the Hollywood Center Project and as Project Design Feature WS-PDF-1, agreed by the Applicant.

SOURCE: LADWP, WSA for the Hollywood Center Project, December 11, 2018, pp. 11 and 12. Provided in Appendix P-2 of this Draft EIR

LADWP determined in the approved WSA for the Hollywood Center Project that there are adequate water supplies available from existing LADWP entitlements and supplies to meet the Project's projected water demand, when considering the existing and planned future demand on LADWP, annually during normal, single-dry, and multiple-dry water years over the next 20 years, as required by SB 610, as well as through at least 2040 (the planning horizon of the LADWP's 2015 UWMP). In addition, as stated in the approved WSA for the Hollywood Center Project, the Project's water demand falls within the LADWP's 2015 UWMP's projected increases in Citywide water demands, while anticipating multi-dry year water conditions during the planning period.[65]

As previously discussed, LADWP expects to have a reliable supply of up to 675,700 acre-feet of water in 2040.[66] As further discussed in the UWMP, LADWP expects to maintain a reliable water supply through conservation, increased recycled water use (including both non-potable and potable reuse), increasing City sources of water, and reducing purchases from the MWD.[67] Between 2015 and 2040, the City's local water supplies are planned to increase from 14 percent to 49 percent of total water supply usage in dry years, and to 47 percent in average years.[68] The City's imported supplies are expected to decrease significantly from 86 percent to 51 percent of water supply use in dry years, and to 53 percent in average years.

With respect to the MWD's ability to sell water to the LADWP, the MWD's 2015 RUWMP shows that with its investments in storage, water transfers, and improving the reliability of the Delta, critical water shortages are not expected to occur within the next 25 years.[69] As previously stated, both the 2015 RUWMP and 2015 IRP anticipate a surplus of available water to meet projected demand.

In addition, the approved WSA for the Hollywood Center Project found that: (1) the Project would be consistent with the demographic projections for the City in both of the SCAG 2012-2035 and 2016-2040 Regional Transportation Plans/Sustainable Communities Strategy (RTP/SCS); (2) the Project's water demand has been accounted for in the City's overall total demand projections in the LADWP 2015 UWMP; and (3) LADWP water supplies would be adequate during normal, single-dry and multi-year dry years to meet the Project's existing and projected future demand through 2040.[70] Based on the 2015 UWMP, which incorporates SCAG 2012-2035 RTP/SCS growth projections, the LADWP determined that it could provide a highly reliable water supply to its customers through 2040, which would include the Project's buildout year of 2027, including during each interim year. Therefore, as determined by the approved WSA for the Hollywood Center

65 LADWP, *WSA for the Hollywood Center Project*, December 11, 2018, p. 5. Provided in Appendix P-2 of this Draft EIR.
66 LADWP, *2015 UWMP*, 2016, p. ES-23.
67 LADWP, *2015 UWMP*, 2016, p. ES-1.
68 LADWP, *2015 UWMP*, 2016, p. ES-20.
69 MWD, *2015 RUWMP*, June 2016, p. ES-5.
70 LADWP, *WSA for the Hollywood Center Project*, December 11, 2018, p. 5. Provided in Appendix P-2 of this Draft EIR.

Project, the 2015 UWMP's projections for water demand and supply would include the water demand required for the Project.

(b) Project with the East Site Hotel Option

Estimated domestic water demand for the Project with the East Site Hotel Option, as determined in the approved WSA for the Hollywood Center Project, are shown in **Table IV.N.2-4**, *Estimated Project Water Demand for the Project with the East Site Hotel Option*.

TABLE IV.N.2-4
ESTIMATED WATER DEMAND FOR THE PROJECT WITH THE EAST SITE HOTEL OPTION

Proposed Uses	Quantity	Water Use Factor (gpd/unit)[a]	Base Demand (gpd)	Water Efficiency Requirements Ordinance Savings (gpd)[b]	Proposed Water Demand (gpd)	Proposed Water Demand (afy)
West Site						
1 BR Market-Rate	195 du	110/du	21,450			
2 BR Market-Rate	198 du	150/du	29,700			
3 BR Market-Rate	56 du	190/du	10,640			
1 BR Senior Affordable	59 du	110/du	6,490			
2 BR Senior Affordable	9 du	150/du	1,350			
East Site						
1 BR Market-Rate	117 du	110/du	12,870			
2 BR Market-Rate	132 du	150/du	19,800			
3 BR Market-Rate	70 du	190/du	13,300			
1 BR Senior Affordable	40 du	110/du	4,400			
2 BR Senior Affordable	8 du	150/du	1,200			
Base Demand Adjustment (Residential Units)[c]			14,690			
Residential Units Total	***884 du***		***135,890***	***32,232***	***103,658***	***116.12***
West Site						
Market-Rate						
Lobby	7,535 sf	50/ksf	377			
Health Club	5,784 sf	650/ksf	3,760			
Office	3,957 sf	120/ksf	475			
Lounge	14,047 sf	50/ksf	702			
Bar	2,470 sf	720/ksf	1,778			
Senior Affordable						
Lobby	1,287 sf	50/ksf	64			
Lounge	1,895 sf	50/ksf	95			

TABLE IV.N.2-4
ESTIMATED WATER DEMAND FOR THE PROJECT WITH THE EAST SITE HOTEL OPTION

Proposed Uses	Quantity	Water Use Factor (gpd/unit)[a]	Base Demand (gpd)	Water Efficiency Requirements Ordinance Savings (gpd)[b]	Proposed Water Demand (gpd)	Proposed Water Demand (afy)
East Site						
Market-Rate						
Hotel Lobby	3,227 sf	50/ksf	161			
Residential Lobby	3,021 sf	50/ksf	151			
Hotel Back of House[d]	1,956 sf					
Hotel Health Club	1,150 sf	650/ksf	748			
Residential Health Club	6,807 sf	650/ksf	4,425			
Hotel Conference Rooms	2,907 sf	120/ksf	349			
Residential Lounge[e]	4,389 sf	50/ksf	219			
Senior Affordable						
Lobby	1,839 sf	50/ksf	92			
Lounge	2,000 sf	50/ksf	100			
Indoor Amenities Total			***13,496***	***4,215***	***9,281***	***10.40***
Hotel Room	220 room	120/room	26,400			
Based Demand Adjustment (Hotel Room)[c]			2,392			
Hotel Room Total			***28,792***	***3,143***	***25,649***	***28.73***
Restaurant[f]	1,232 seats	30/seat	36,960			
Commercial Total			***36,960***	***4,890***	***32,070***	***35.93***
West Site						
Spa	240 sf		23			
Pool	2,240 sf		210			
East Site						
Spa	125 sf		12			
Pool	2,125 sf		200			
Outdoor Common Space			***444***	***0***	***444***	***0.50***
Landscaping[g]	**23,844 sf**		**2,227**	**1,029**	**1,198**	**1.34**
Covered Parking[h]	**676,111 sf**	**0.02/sf**	**445**	**0**	**445**	**0.50**
Cooling Tower Total	**3,000 ton**	**21.64**	**64,911**	**48,192**	**16,719**	**18.73**
Proposed Subtotal			**283,165**	**93,701**	**189,464**	**212.25**
Less Existing Uses to Be Removed					0	0.00
Less Additional Conservation[i]					-6,568	-7.36
Additional Water Demand for the Project with the East Site Hotel Option					**182,896**	**204.89**

TABLE IV.N.2-4
ESTIMATED WATER DEMAND FOR THE PROJECT WITH THE EAST SITE HOTEL OPTION

Proposed Uses	Quantity	Water Use Factor (gpd/unit)[a]	Base Demand (gpd)	Water Efficiency Requirements Ordinance Savings (gpd)[b]	Proposed Water Demand (gpd)	Proposed Water Demand (afy)
BR = bedroom; du = dwelling unit; sf = square feet; ksf = 1,000 square feet; gpd = gallons per day; afy = acre-feet per year						
[a] Water Use Factor is based on City's Department of Public Works, LASAN sewer generation rates. The land uses listed in this table are reflective of the categories used by LASAN.						
[b] The Project's land uses would conform to the City's Ordinance No. 184,248, 2017 Los Angeles Plumbing Code, and the 2017 Los Angeles Green Building Code.						
[c] Base Demand Adjustment is the estimated savings due to Ordinance No. 180,822 accounted for in the current version of the LASAN sewer generation rates.						
[d] Back of House includes hotel room service kitchen.						
[e] Per correspondence with LADWP on December 27, 2018, the additional water demand for the Project with the East Site Hotel Option is still 205 afy with the inclusion of the residential lounge water demand. Therefore, it does not qualify as a substantial increase in water per Water Code Section 10910. The approved WSA for the Hollywood Center Project does not need to be amended to account for the water demand from the residential lounge.						
[f] 30,176 square feet (12,691 square feet for the West Site and 17,485 square feet of the East Site) of the proposed Restaurant/Retail uses are assumed to be all full service restaurant for a conservative estimate. The proposed restaurant scope includes dining areas in the Outdoor Common Space. The number of seats provided is based on design estimates regarding the number of seats that can fit inside of the restaurant/retail areas.						
[g] Landscaping water use is estimated per California Code of Regulations Title 23, Division 2, Chapter 2.7, Model Water Efficient Landscape Ordinance.						
[h] Auto parking water uses are based on City of Los Angeles Department of Public Works, LASAN Sewer Generation Rates table, and assumes 12 times/year cleaning.						
[i] Water conservation due to conservation commitments, as detailed on page 14 of the approved WSA for the Hollywood Center Project and as Project Design Feature WS-PDF-1, agreed by the Applicant.						
SOURCE: LADWP, WSA for the Hollywood Center Project, December 11, 2018, pp. 11 and 12. Provided in Appendix P-2 of this Draft EIR.						

As indicated in Table IV.N.2-4, the Project with the East Site Hotel Option would result in a total increase in domestic water demand of an estimated 182,896 gpd or 204.89 afy, which is higher than the Project's water consumption. This estimate takes into account regulatory required water conservation features and the additional water conservation features of the Project in the approved WSA for the Hollywood Center Project (e.g., Project Design Feature WS-PDF-1), which together would account for 35.4 percent of the base demand of 283,165 gpd.[71]

The approved WSA for the Hollywood Center Project provided the same conclusions for the Project with the East Site Hotel Option as it did for the Project (i.e., the approved WSA for the Hollywood Center Project found that the Project with the East Site Hotel Option would:

[71] The required water conservation features would reduce the water demand by 93,701 gpd. Project Design Feature WS-PDF-1 would reduce water demand by 6,568 gpd. Together (100,269 gpd), they would account for 35.4 percent of the base demand of 283,165 gpd.

(1) be consistent with the demographic projections for the City in both of the SCAG 2012-2035 and 2016-2040 RTP/SCSs; (2) the water demand has been accounted for in the City's overall total demand projections in the LADWP 2015 UWMP; and (3) LADWP water supplies would be adequate during normal, single-dry and multi-year dry years to meet the existing and projected future demand through 2040).[72] Based on the 2015 UWMP, which incorporates SCAG 2012-2035 RTP/SCS growth projections, the LADWP determined that it could provide a highly reliable water supply to its customers through 2040, which would include the Project and Project with the East Site Hotel's buildout year of 2027, including during each interim year. Therefore, as determined by the approved WSA for the Hollywood Center Project, the 2015 UWMP's projections for water demand and supply would include the water demand required for the Project with the East Site Hotel Option.

(c) Conclusion

Sufficient domestic water supplies are available to service the Project and the Project with the East Site Hotel Option and reasonably foreseeable future development during normal, dry and multiple dry-years. Therefore, operational impacts on water supply would be less than significant.

(2) Mitigation Measures

Impacts regarding domestic water supplies were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding domestic water supplies were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

The Project and the Project with the East Site Hotel Option would result in the same water infrastructure impacts. Therefore, cumulative water infrastructure impacts would be the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the cumulative water infrastructure impact analysis and impact significance presented below are the same and also apply to the Project and the Project with the East Site Hotel Option.

The Project and the Project with the East Site Hotel Option would result in different water demand amounts. Therefore, a separate water demand calculation is included in the impact analysis for the Project with the East Site Hotel Option. However, conclusions regarding the cumulative water supply impact analysis and impact significance presented below are the same and also apply to the Project and the Project with the East Site Hotel Option.

[72] LADWP, *WSA for the Hollywood Center Project*, December 11, 2018, p. 5. Provided in Appendix P-2 of this Draft EIR.

(1) Impact Analysis

The geographic context for the cumulative impact analyses on water infrastructure and water supply is the vicinity of the Project Site (i.e., the water infrastructure that would serve the Project and the LADWP service area, respectively). Chapter III, *Environmental Setting*, of this Draft EIR, identifies 150 related projects, 123 of which are located within the City, and 27 of which are located within the neighboring City of West Hollywood.

(a) Water Infrastructure

Development of the Project, in conjunction with the related projects, would cumulatively increase service demand on the existing water infrastructure system. However, each related project would be subject to City review to assure that the existing public utility facilities would be adequate to meet the domestic and fire water demands of each project. All projects are required to obtain a SAR, based on flow testing of facilities, to verify that there is available service. Individual projects are required to improve facilities where appropriate and development cannot proceed without appropriate verification and approval. Furthermore, LADWP, together with the City's Department of Public Works, conducts ongoing evaluations to ensure facilities are adequate and requires infrastructure system improvements as needed. Based on these facts and the above analysis relating to the Project's construction and operational impacts on the City's water infrastructure system**, the Project's or the Project with the East Site Hotel Option's incremental effects on the water infrastructure system would not be cumulatively considerable. Cumulative impacts on water infrastructure would be less than significant.**

(b) Water Supply

As discussed above, LADWP, as a public water service provider, is required to prepare and periodically update its UWMP to plan and provide for water supplies to serve existing and projected demands. LADWP's 2015 UWMP accounts for existing development within the LADWP service area, as well as projected growth through the year 2040. Additionally, under the provisions of SB 610, LADWP is required to prepare a comprehensive WSA for every new development "project" (as defined by Section 10912 of the Water Code) within its service area that meets certain criteria. The WSAs for such projects, in conformance with the UWMP, would evaluate the reliability of existing and projected water supplies, as well as alternative sources of water supply and measures to secure alternative sources if needed, on a project-by-project basis.

The 150 related projects would contribute, in conjunction with the Project, to overall water demand from LADWP.

As indicated in **Table IV.N.2-4**, *Estimated Cumulative Water Demand*, the estimated cumulative water demand would be 9,687,407.355 gpd or 10,851.56 afy for the Project, or 9,707,206 gpd or 10,873.55 afy for the Project with the East Site Hotel Option. These estimates are likely conservative (i.e., high) since they do not account for the removal/replacement of existing uses that currently generate demand or quantify code-required conservation or applicant conservation commitments that would reduce demand by the related projects.

TABLE IV.N.2-4
ESTIMATED CUMULATIVE WATER DEMAND

Land Uses	Quantity	Generation Factor	Estimated Water Demand (gpd)[a]	Estimated Water Demand (afy)
Bar[b]	37.322 ksf	720 gpd/ksf	26,872	30.10
Coffee Shop[c]	29.364 ksf (2,937 seats)	25 gpd/seat	73,425	82.25
Commercial	199.640 ksf	50 gpd/ksf	9,982	11.18
Conference Room[d]	85.782 ksf	120 gpd/ksf	10,294	11.53
Health Club	26.500 ksf	650 gpd/ksf	17,225	19.29
Hotel	6,698 rooms	120 gpd/room	803,760	900.32
Medical Center	134.750 ksf	250 gpd/ksf	33,688	37.73
Museum	44.0 ksf	50 gpd/ksf	2,200	2.46
Office	6,962.086 ksf	170 gpd/ksf	1,183,555	1,325.75
Residential	16,092 du	150 gpd/du	2,413,800	2,703.79
Restaurant[e]	1,493.271 ksf (99,552 seats)	30 gpd/seat	2,986,560	3,345.37
Retail (greater than 100,000 sf)	771.739 ksf	50 gpd/ksf	38,587	43.22
Retail (less than 100,000 sf)	869.119 ksf	25 gpd/ksf	21,728	24.34
Schools	557.6 students	11 gpd/stu	6,134	6.87
Storage	37.201 ksf	30 gpd/ksf	1,116	1.25
Theater[f]	5,686.148 ksf (631,795 seats)	3 gpd/seat	1,895,385	2,123.10
Subtotal Related Projects			**9,524,310**	**10,668.55**
Project Subtotal			**163,098**	**183**
Related Projects + Project Water Demand Total			**9,687,408**	**10,851.55**
Project with East Site Hotel Option Subtotal			**182,896**	**205**
Related Projects + Project with East Site Hotel Option Water Demand Total			**9,707,206**	**10,873.55**

ksf = thousand square feet; gpd = gallons per day; du = dwelling units; afy = acre-feet per year. 1 afy = 892.15 gpd.

[a] Totals may not add up due to rounding.

[b] All Bar uses use the Bar: Cocktail, Public Table Area factor.

[c] All coffee shops use the Coffee House: Services Prepared Food factor. Coffee shops assume each seat will occupy 10 square feet.

[d] Banquet Hall, Meeting Room, Youth and Senior Center, and Community Center uses use the Conference Room factor.

[e] All restaurant uses use the Restaurant: Full Service Outdoor Seat Factor. Restaurants assume each seat will occupy 15 square feet. Mixed Use and Other uses are combined into the Restaurant uses to be conservative.

[f] Theater, Special Events, Amphitheater, Park, Studio, Sound Stage, and Stage Support are included in the Theater subcategory and uses the Theater; Cinema factor. Theater assumes each seat occupies 9 square feet.

SOURCE: ESA, 2020.

As discussed with respect to Project impacts above, LADWP expects to have a reliable supply of up to 675,700 afy of water in 2040 to service an estimated demand of 675,700 afy based on anticipated growth (565,600 afy with implementation of all existing and planned future water conservation measures), which would include projects that are accounted for within SCAG's 2012-2035 RTP/SCS.[73]

LADWP expects to accommodate future demand in part by increasing the proportion of water supply being purchased from the MWD. The MWD's 2015 RUWMP shows that with its investments in storage, water transfers, and improving the reliability of the Delta, water shortages are not expected to occur within the next 25 years. As previously indicated, both the 2015 RUWMP and 2015 IRP anticipate a surplus of available water to meet projected demand.

Compliance by the Project and the related projects with regulatory requirements that promote water conservation, such as the CALGreen Code, City's Green Building Code, and the LAMC, would also ensure that adequate water supplies are available on a cumulative basis. Moreover, the approved WSA for the Hollywood Center Project provides a more detailed accounting of the reliable water supply sources for the Project and cumulative growth in the future than is presented in this impact analysis. For example, the approved WSA for the Hollywood Center Project identifies long-term water conservation strategies, including conservation rebates and incentives to reduce indoor and outdoor water use, retrofitting facilities with water-efficient hardware, promoting water efficiency in new developments, water recycling, enhanced stormwater capture, and accelerating clean-up of the San Fernando Basin to increase its contribution to the water supply.

In addition, similar to the Project, for each related project, LADWP would be required to determine whether or not it could provide a highly reliable water supply to its customers. The related projects that would trigger SB 610 would require an approved WSA, which would require for (1) the project to be consistent with the demographic projections for the City in both the 2012-2035 and 2016-2040 RTP/SCSs, whereas other projects that would not trigger SB 610 would be required to coordinate with the service provider, LADWP, to ensure that the respective project would have available supply and capacity to serve the project; (2) the project's water demand has been accounted for in the City's overall total demand projections in the LADWP 2015 UWMP; and (3) LADWP water supplies would be adequate during normal, single-dry and multi-year dry years to meet the project, existing, and projected future demand through 2040. As determined in Section IV.J, *Population, Housing, and Employment*, of the Draft EIR, the related projects would generate population, housing, and employment growth within the 2040 SCAG projections identified in the 2016–2040 RTP/SCS for the City. As LADWP's UWMPs would use the SCAG projections, the related projects that are consistent with the City's General Plan are included in the planned growth of the City's water demand. Further, related projects would be required to comply with SB 610 as needed and would be evaluated on a case-by-case basis. Additionally, as previously stated, LADWP expects to have a reliable

[73] LADWP, *2015 UWMP*, page ES-23.

supply of up to 675,700 afy of water in 2040, which would service the water demand generated by the Project and related projects. **Therefore, the Project's or the Project with the East Site Hotel Option's contribution to cumulative impacts would not be cumulatively considerable. As such, cumulative impacts on water supply would be less than significant.**

(2) Mitigation Measures

Cumulative impacts regarding water supply were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts regarding water supply were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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IV. Environmental Impact Analysis

N.3 Solid Waste

1. Introduction

This section analyzes potential impacts of the Project on the existing and planned capacity of designated Class III landfills (non-hazardous municipal solid waste) and inert landfills (non-hazardous earth and earth-like products, such as yard waste, trash, direct, concrete and asphalt). This section also evaluates Project consistency with applicable requirements to divert waste and increase recycling of the waste stream.

2. Environmental Setting

a) Regulatory Framework

The following discussion summarizes the regulations governing solid waste source reduction, recycling and diversion, collection, and disposal in the City of Los Angeles (City). For discussion of hazardous waste, see Section IV.F, *Hazards and Hazardous Materials*, of this Draft EIR.

(1) State

(a) Assembly Bill 939 – California Integrated Waste Management Act of 1989

The State Legislature passed the California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939) to improve solid waste disposal management with respect to (1) source reduction, (2) recycling and composting, and (3) environmentally safe transformation and land disposal. AB 939 mandates jurisdictions to meet a diversion goal of 25 percent by 1995 and 50 percent by 2000.[1]

AB 939 requires all counties and cities to prepare a comprehensive solid waste management program that includes a Source Reduction and Recycling Element (SRRE) to address waste characterization, source reduction, recycling and composting, solid waste facility capacity, education and public information, funding, special waste (asbestos, sewage sludge, etc.), and household hazardous

[1] California Department of Resources, Recycling, and Recovery (CalRecycle), Waste Diversion Activities at Solid Waste Landfills and Closed and Closing Disposal Sites, August 14, 2018, https://www.calrecycle.ca.gov/lea/advisories/50, accessed March 10, 2020.

waste. Annual reports are required to document the jurisdiction's achievements in meeting the requirements of AB 939, including planned and implemented solid waste diversion programs and facilities and all required supporting documentation. The CoIWMP also has to include a Non-Disposal Facility Element (NDFE) to identify non-disposal facilities to be used in order to assist counties in reaching AB 939's diversion mandates. Non-disposal facilities include material recovery facilities, transfer stations, large-scale composting facilities, and other facilities that require a solid waste facility permit. Lastly, the CoIWMP has to include a Household Hazardous Waste Element (HHWE) to reduce the amount of hazardous household waste generated and to provide the County with convenient collection services and promote waste minimization/ reduction techniques. It also requires counties to develop a Siting Element that addresses how each county, and cities within that county, will manage their solid waste disposal over 15-year planning periods. The Siting Elements also include goals and policies to ease the use of out-of-County/remote landfills and foster the development of alternatives to landfill disposal (e.g. conversion technologies). See further discussion of the Los Angeles County Siting Element below under regional regulations. Oversight of these activities was set up under the charge of the California Integrated Waste Management Board (CIWMB). The duties and responsibilities of CIWMB were transferred to the California Department of Resources, Recycling, and Recovery (CalRecycle) as of January 1, 2010.

(b) Assembly Bill 1327 – California Solid Waste Reuse and Recycling Access Act of 1991

The California Solid Waste Reuse and Recycling Access Act of 1991 (AB 1327), passed on October 11, 1991, required CalRecycle to develop a model ordinance for adoption of recyclable materials in development projects by March 1, 1993.[2] Local agencies were then required to adopt the model, or an ordinance of their own, governing adequate areas for collection and loading of recyclable materials in development projects by September 1, 1993. If, by that date, a local agency had not adopted its own ordinance, the CalRecycle model ordinance took effect and shall be enforced by the local agency. As further discussed in Subsection IV.N.3.2, Environmental Setting, under the Los Angeles Municipal Code (LAMC), the City passed such an ordinance in 1997 (Recycling Space Allocation, Ordinance No. 171,687).

(c) Senate Bill 1374 – Construction and Demolition Waste Materials Diversion Requirements

Senate Bill (SB) 1374 was signed into law in 2002 to assist jurisdictions with diverting their construction and demolition (C&D) waste.[3] The legislation requires the CIWMB (now CalRecycle) complete five items in regards to the diversion of construction and demolition waste: (1) adopt a model ordinance for diverting 50

2 California Public Resources Code, Sections 42900-42911.
3 California Public Resources Code, Section 42912.

percent to 75 percent of all construction and demolition debris from landfills; (2) consult with multiple regulators and waste entities (e.g., California State Association of Counties, private and public waste services, building construction materials industry, etc.) during the development of the model ordinance; (3) compile a report on programs that can be implemented to increase diversion of C&D waste; (4) post a report on the agency's website for general contractors on methods that contractors can use to increase diversion of C&D waste materials; (5) post on the agency's website a report for local governments with suggestions on programs to increase diversion of C&D waste. Under SB 1374, jurisdictions must also include in their annual AB 939 report a summary of the progress made in diverting C&D waste. The model ordinance was adopted by CalRecycle on March 16, 2004.[4]

(d) Assembly Bill 341 – Amendments to the California Integrated Waste Management Act of 1989

AB 341, which took effect on July 1, 2012, amends AB 939 by mandating that jurisdictions meet a solid waste diversion goal of 75 percent by the year 2020, and requires commercial enterprises and public entities that generate four or more cubic yards (cy) per week of solid waste, and multi-family housing complexes with five or more units, to adopt recycling practices that achieve a 75-percent reduction in their waste streams. Such business/residential development must: (1) source separate recyclable materials from the solid waste they are discarding, and either self-haul or arrange for separate collection of the recyclables; and (2) subscribe to a service that includes mixed waste processing that yields diversion results comparable to source separation.

(e) Assembly Bill 1826 – Organic Recycling

Effective April 1, 2016, AB 1826 requires businesses that generate more than four cubic yards of organic waste (food, green and non-hazardous wood waste) per week, and multi-family properties with five units or more, to provide separate recycling bins for organic waste, and requires that local jurisdictions implement an organic waste recycling program to divert organic waste generated by businesses.[5] Furthermore:

a) Effective April 1, 2016, all businesses that generate eight cubic yards of organic waste per week shall arrange for organic waste recycling services.

b) Effective January 1, 2017, all businesses that generate four cubic yards of organic waste per week shall arrange for organic waste recycling services.

4 CalRecycle, Senate Bill 1374 (2002), August 24, 2018, https://www.calrecycle.ca.gov/lgcentral/library/canddmodel/instruction/sb1374, accessed March 10, 2020.

5 California Public Resources Code, Sections 42649.8 et seq.

c) Effective January 1, 2019, all businesses that generate four cubic yards or more of commercial solid waste per week shall arrange for organic waste recycling services.

d) Effective January 1, 2020, if statewide disposal of organic waste has not been reduced to 50 percent of the level of disposal during 2014, all businesses that generate two cubic yards or more of commercial solid waste per week shall arrange for organic waste recycling services.

(f) California Green Building Standards Code

The most recent update to the California Green Building Standards (CCR, Title 24, Part 11), commonly referred to as the CALGreen Code, went into effect on January 1, 2020. The 2019 CALGreen Code has revised provisions that require new buildings to reduce water consumption, increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials.[6] Local jurisdictions also retain the administrative authority to exceed the CALGreen Code. As described further in Subsection IV.N.3.2, Environmental Setting, under Los Angeles Green Building Code, the City has updated the Los Angeles Green Building Code in compliance with the 2019 CALGreen Code, with the 2020 requirements applicable to projects filed on or after January 1, 2020.[7]

(2) Regional

(a) Countywide Integrated Waste Management Plan

Pursuant to AB 939, each County is required to prepare and administer a Countywide Integrated Waste Management Plan (ColWMP), including preparation of an Annual Report. The ColWMP, per AB 939, comprises the counties' and cities' SRRE, an Integrated Waste Management Summary Plan (Summary Plan), and a Countywide Siting Element (CSE). The Summary Plan describes the steps to be taken by local agencies, acting independently and in concert, to achieve the mandated state diversion rate by integrating strategies aimed toward reducing, reusing, recycling, diverting, and marketing solid waste generated within the County. The County's Department of Public Works is responsible for preparing and administering the Summary Plan and the CSE. The Summary Plan for the County was approved by CalRecycle on June 23, 1999. The latest CSE was approved by CalRecycle in 2012. An EIR for this document was scheduled to be released for public review in early 2016, but as of June 2018 the document has not been published.

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6 California Building Standards Commission, 2019 California Green Building Standards Code, effective January 1, 2020, https://www.dgs.ca.gov/BSC/Resources/Page-Content/Building-Standards-Commission-Resources-List-Folder/CALGreen#@ViewBag.JumpTo, accessed March 10, 2020.

7 City of Los Angeles Department of Building and Safety, 2020 Green Building Forms & Correction Sheets, http://www.ladbs.org/forms-publications/forms/green-building/2020-green-building-forms-correction-sheets, accessed March 10, 2020.

The County conducts regional planning for the provision of landfill services, including preparing and administering the CoIWMP in response to AB 939. The County continually evaluates landfill disposal needs and capacity as part of the preparation of the CoIWMP Annual Report. 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. The most recent annual report, the CoIWMP 2018 Annual Report, published in December 2019, provides disposal analysis and facility capacities for 2018, as well as projections to the CoIWMP's horizon year of 2033.[8] As stated within the CoIWMP 2018 Annual Report, the County is not anticipating a solid waste disposal capacity shortfall within the next 15 years under current conditions.[9] A variety of strategies, including mandatory commercial recycling, diversion of organic waste, and alternative technologies (e.g., engineered municipal solid waste conversion facilities or anaerobic digestion) would be implemented to ensure that the County would be able to accommodate the solid waste generated through the horizon year of 2033.[10]

(3) Local

(a) City of Los Angeles General Plan Framework Element

Chapter 9, Infrastructure and Public Services, of the City's General Plan Framework Element identifies goals, objectives, and policies for utility provision in the City including provision of Solid Waste service.[11] The goals, objectives and policies generally pertain to overall operations of the solid waste management system. Goal 9D provides an overall approach to solid waste management and sets a framework in which individual development projects would operate. Goal 9D calls for "an integrated solid waste management system that maximizes source reduction and materials recovery and minimized the amount of waste requiring disposal."

The General Plan Framework Element addresses many of the programs the City has implemented to divert waste from disposal facilities such as source reduction programs and recycling programs (e.g., Curbside Recycling Program and composting). Furthermore, the General Plan Framework Element states that for these programs to succeed, the City should locate businesses where recyclables can be handled, processed, and/or manufactured to allow a full circle recycling system to develop. The General Plan Framework Element indicates that more

8 County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan (CoIWMP) 2018 Annual Report, December 2019.

9 County of Los Angeles Department of Public Works, CoIWMP 2018 Annual Report, December 2019, p. 6.

10 County of Los Angeles Department of Public Works, CoIWMP 2018 Annual Report, December 2019, p. 37.

11 City of Los Angeles Department of City Planning, Citywide General Plan Framework: An Element of the City of Los Angeles General Plan. Chapter 9, Infrastructure and Public Services.

transfer facilities will be needed to dispose of waste at remote landfill facilities due to the continuing need for solid waste transfer and disposal facilities, as well as the limited disposal capacity of the landfills in Los Angeles. Several landfill disposal facilities accessible by truck and waste-by-rail landfill disposal facilities that could be used by the City are identified to meet its disposal needs.[12]

(b) City of Los Angeles Solid Waste Management Policy Plan

The City's Solid Waste Management Policy Plan (CiSWMPP) is a long-range policy plan adopted in 1993 to provide direction for the solid waste management.[13] The objective of the CiSWMPP is to promote source reduction or recycling for a minimum of 50 percent of the City's waste by 2000, or as soon as possible thereafter, and 70 percent of the waste by 2020. The CiSWMPP calls for the disposal of the remaining waste in local and possibly remote landfills. Pursuant to the requirement of AB 939, the CiSWMPP contains a SRRE to address waste characterization, source reduction, recycling, composting, solid waste facility capacity, education and public information, funding, special waste (asbestos, sewage sludge, etc.), and household hazardous waste. The SRRE includes goals and objectives for achieving the diversion rates.

The Plan's goal has also been surpassed by the City, which achieved a diversion rate of 76.4 percent in 2012.[14] The responsibility for documenting waste diversion efforts for the City of Los Angeles lies with the Bureau of Sanitation (LASAN). As set forth below, more recent plans have been adopted by the City to further its waste reduction and recycling goals.

(c) Recovering Energy, Natural Resources and Economic Benefit from Waste for L.A.

The Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan was adopted by the City in 2006 for the purpose of facilitating a shift from solid waste disposal to resource recovery.[15] Its purpose is to move Los Angeles away from dependency on landfills for disposal of waste materials and to create renewable green energy ("green collar jobs") by incentivizing local recycling and re-manufacturing industries. The primary objective of RENEW LA is to achieve a zero waste goal through reducing, reusing, recycling, or converting the resources currently going to disposal. The plan calls for obtaining

12 City of Los Angeles Department of City Planning, Citywide General Plan Framework, Chapter 9, originally adopted December 11, 1996 and readopted August 8, 2001,

13 City of Los Angeles Bureau of Sanitation (LASAN), Solid Waste Integrated Resources Plan (SWIRP) – A Zero Waste Master Plan, October 2013, adopted April 2015, p. 8.

14 LASAN, Recycling, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=auguwdldg_5&_afrLoop=10870014375826670#!, accessed December 12, 2018.

15 LASAN, Fact Sheet: Solid Waste Facilities, accessed December 12, 2018.

a minimum 90 percent diversion level by 2025 and gives direction to City departments about how to attain the objective.

Under RENEW LA, the City committed to achieving zero waste by diverting 70 percent of the solid waste generated in the City by 2013 and 90 percent by 2025; recycling, and composting efforts; initiating new programs, such as the development of seven conversion technology facilities, one in each of the City's "wastesheds"; and converting the LASAN fleet to clean fuel Liquid Natural Gas vehicles.[16,17]

(d) Solid Waste Integrated Resources Plan

LASAN adopted the Solid Waste Integrated Resources Plan (SWIRP) planning process to build on the direction provided by RENEW LA, as well as directives of the Mayor and City Council to achieve 70 percent recycling by 2015 and 90 percent by 2025.[18] The SWIRP planning process began in 2007. A Zero Waste Master Plan was published in October 2013 along with a Notice of Completion for a Draft Program EIR. The SWIRP provides a long-range master plan for the City's solid waste management needs through 2030. SWIRP identifies the policies, programs, and facilities that will be needed to reach the City's goal of 90 percent landfill diversion by 2025. The goals of the SWIRP are to eliminate the City's use of urban landfills, develop alternative technologies for long term waste disposal, and increase recycling and resource recovery and to convert the entire LASAN fleet to clean fuel Liquid Natural Gas vehicles with the ultimate goal of leading Los Angeles towards being a "zero waste" City by 2030.[19]

(e) Los Angeles Green Building Code (Ordinance No. 181,480)

In April 2008, the City adopted the Green Building Program Ordinance (Ordinance No. 181,480) to address the impact on climate change from new development. In 2011, 2014, and 2016, Chapter IX of the LAMC, referred to as the LA Green Building Code, was amended to incorporate various provisions of the CALGreen Code. The LA Green Building Code includes mandatory requirements and elective measures for three categories of buildings: (1) low-rise residential buildings; (2) non-residential and high-rise residential buildings; and (3) additions and alternations to residential and non-residential buildings. Section 99.04.408.1 of the Green Building Code governs construction waste reduction, disposal, and recycling, and requires construction waste reduction of at least 60 percent, in

16 LASAN, Fact Sheet: Solid Waste Facilities.

17 LASAN, Solid Waste Integrated Resources Plan (SWIRP) – A Zero Waste Master Plan, October 2013, adopted April 2015, p. ES-I.

18 LASAN, Solid Waste Integrated Resources Plan (SWIRP) – A Zero Waste Master Plan, October 2013, adopted April 2015, p. ES-I.

19 The term "zero waste" refers to maximizing recycling, minimizing waste, reducing consumption, and encouraging the use of products with recycled/reused materials. As noted by the City, "zero waste" is a goal and not a categorical imperative; the City is simply seeking to come as close to "zero waste" as possible.

compliance with LAMC Section 66.32 (the Construction and Demolition [C&D] Waste Recycling Ordinance). Projects filed after January 1, 2017 are required to comply with the 2016 CALGreen Code.

(f) Recycling Space Allocation Ordinance (Ordinance No. 171,687)

The Recycling Space Allocation Ordinance (Ordinance No. 171,687) was adopted on August 13, 1997 to meet the requirements of AB 1327, the California Solid Waste Reuse and Recycling Access Act of 1991.[20] Ordinance No. 171,687 establishes requirements for the inclusion of recycling areas or rooms within development projects.

(g) Senate Bill 1374 - Construction and Demolition Waste Recycling Ordinance and Waste Hauler Permit (Ordinance No. 181,519)

On March 5, 2010, to comply with SB 1374, the Los Angeles City Council approved Ordinance No. 181,519[21] pertaining to a Citywide Construction and Demolition Waste Recycling Ordinance[22] that requires all mixed C&D waste generated within City limits to be taken to City-certified C&D waste processors. In addition, the City initiated a Waste Hauler Permit Program that requires all private waste haulers collecting solid waste within the City, including C&D waste, to obtain AB 939 Compliance Permits prior to collecting, hauling, and transporting C&D waste and to transport C&D waste only to City-certified C&D processing facilities. These facilities process received materials for reuse and have recycling rates that vary from 70 percent to 86 percent, thus exceeding the 70 percent reclamation standard.[23] Additionally, compliance with the Ordinance and the LAMC Section 66.32, which requires the haulers to meet the diversion goals, would ensure that 70 percent of solid waste generated by the City, including C&D waste, would be recycled.

(h) City of Los Angeles Curbside Recycling Program

The City currently operates the largest residential curbside recycling program in the United States, collecting a variety of recyclables from over 750,000 households per week. The four-bin collection system consists of blue bins (recyclables), green bins (tree and yard trimmings), black bins (residual waste), and brown bins (horse manure). Using fully automated collection vehicles in conjunction with 90-gallon

20 LASAN, Citywide Construction and Demolition Waste Recycling Ordinance, 1997.
21 City of Los Angeles, Council File 09-3029, March 5, 2010.
22 City of Los Angeles, Ordinance No, 181,519, March 5, 2010.
23 LASAN, Strategic Programs, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-c/s-lsh-wwd-s-c-whp?_adf.ctrl-state=1az3pjox07_5&_afrLoop=69763588165455#!, accessed December 12, 2018.

blue recycling containers and 90-gallon green yard waste containers, the City currently collects an average of 800 tons per day (tpd) of recyclable materials and 1,700 tpd of green waste from City residents. Participating residents include 530,000 single-family homes and 220,000 small multi-family units. Currently, combining with the multi-family and other City recycling programs, the diversion rate is 76.4 percent.[24]

(i) Citywide Exclusive Franchise System for Municipal Waste Collection and Handling (Ordinance No. 182,986)

Until 2017, the City provided solid waste collection and disposal services primarily to single-family and small multi-family residential land uses (less than four units). As of 2013, it was estimated that between 500 and 750 permitted private haulers provided these services on the open market for larger multi-family residential, commercial, industrial, and institutional land uses; approximately 45 of these haulers serviced solely commercial uses, and many of the remaining haulers provided C&D waste collection and disposal services. These private haulers were required to obtain City permits to operate within the City limits, but were not otherwise regulated by the City and were contracted privately by individual establishments. The haulers were not obligated to offer recycling, meet diversion requirements, or operate low emission or clean fuel vehicles. This constrained the City's ability to meet its state-mandated solid waste diversion goals, since approximately 70 percent of the City's solid waste disposed of in landfills is generated by larger multi-family residential uses (five units or more) and commercial uses.[25]

To increase its ability to meet state-mandated solid waste diversion goals, as well as address other environmental and health impacts of the largely unregulated solid waste and collection system for those uses, the City adopted an ordinance in April 2014 (Ordinance 182,986) that implemented an exclusive franchise system for municipal solid waste collection from larger multifamily and commercial land uses. (The ordinance does not apply to the collection and disposal of C&D waste, medical, pharmaceutical, hazardous, or radioactive waste, or certain other types of waste.) As part of this system, known as RecycLA and officially launched in 2017, the City now mandates maximum annual disposal levels and diversion requirements for haulers operating in each of 11 defined City franchise zones. This allows the City to meet and exceed the State's requirements for waste diversion and the provision of mandatory commercial and multifamily recycling. It also allows the City to fulfill a number of other environmental goals, including realizing waste

24 LASAN, Blue Bin Recycling.

25 LASAN, Draft Program EIR for City Ordinance: City-Wide Exclusive Franchise System for Municipal Solid Waste Collection and Handling, Notice of Preparation of an Environmental Impact Report (EIR) and Public Scoping Process, February 26, 2013.

collection route efficiencies and lowering vehicle miles traveled, allowing control over the age and fuel efficiency of fleet vehicles, and enabling improved health and safety conditions for workers.[26]

b) Existing Conditions

(1) Project Site Solid Waste Generation

The Project Site is located in the Hollywood Community Plan area of the City. The Project Site is currently developed with a single-story commercial building currently leased by AMDA and surface parking lot on the West Site, and the Capitol Records Complex with a dedicated surface parking lot on the East Site. No existing residential or other commercial uses are located on the Project Site. The AMDA-leased building is used on a daily basis for sets and props, and any solid waste generated is minimal. The existing Capitol Records Complex would not be affected by the Project. Therefore, for conservative purposes, it is assumed that all new solid waste generated by the Project would represent an increase over current conditions.

(2) City of Los Angeles Solid Waste Generation and Collection

Solid waste management in the City involves both public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. LASAN is responsible for developing strategies to manage solid waste collection and disposal in the City. LASAN primarily collects solid waste generated by single-family dwellings, most small multi-family dwellings usually consisting of four units or fewer, and public facilities. Private hauling companies contracted with the City primarily collect solid waste generated by larger multi-family residential, commercial, and industrial properties.

(3) City of Los Angeles Solid Waste Disposal

The City does not own or operate any landfills; the majority of solid waste generated in the City is disposed of at County landfills. Per the CoIWMP 2018 Annual Report, the latest CoIWMP available, while the economy has continued to grow in recent years, the amount of waste that residents and businesses generated and disposed of in the County remained relatively low.[27] The CoIWMP 2018 Annual Report shows a downward disposal trend from 2007 to 2010 and a plateau at 2010 levels between 2011 through 2014. While there was an increase

[26] City of Los Angeles, LASAN, RecycLA, 2017.

[27] County of Los Angeles Department of Public Works, CoIWMP 2018 Annual Report, December 2019, p. 5.

from 2014 to 2018, there is an overall reduction from 2005 to 2018.[28] In 2018, the most recent year for which reported data is available, County disposed of approximately 10.5 million tons of materials, compared to approximately 11.5 million tons in 2007, resulting in an overall reduction of approximately 1 million tons of solid waste. Based on these reductions, the CoIWMP assumes an ongoing diversion rate of 65 percent Countywide.[29] The overall reduction is due to the reduction in waste disposal at in-county facilities, likely due to the County's solid waste management efforts, markets for recyclable materials, development of alternative technology facilities, diversion credit for such facilities, and the State's AB 341 75 percent recycling goal. The 2018 average daily disposal for in-county landfills was 16,011 tpd and the maximum daily capacity was 34,449 tpd.[30]

As described in the Regulatory Framework, the County has prepared and is updating its CoIWMP, including annual reports and a master plan for meeting waste disposal needs through 2033. The most recent CoIWMP 2018 Annual Report indicates that the County can adequately meet future Class III disposal needs through 2033 through scenarios that include a combination of all or some of the following: (1) maximize waste reduction and recycling; (2) expand existing landfills; (3) study, promote, and develop alternative technologies; (4) expand transfer and processing infrastructure; and (5) out-of-county disposal (including waste-by-rail).[31]

(a) Class III Landfills

Class III landfills accept non-hazardous municipal solid waste. There are 10 Class III landfills in the County, which collectively accept the majority of solid waste generated in the County (approximately 4,995,296 tons), followed by exports to out-of-County landfills in Orange, Riverside, San Bernardino, Ventura, and Kern Counties (5,120,871 tons) and transformation facilities (366,642 tons).[32] The remaining disposal capacity for the County's Class III landfills is estimated at approximately 163.39 million tons as of December 31, 2018.[33]

28 County of Los Angeles Department of Public Works, CoIWMP 2018 Annual Report, December 2019, p. age 5, Figure 1, Disposal Trend.

29 County of Los Angeles Department of Public Works, CoIWMP 2018 Annual Report, December 2019, p. 26.

30 County of Los Angeles Department of Public Works, CoIWMP 2018 Annual Report, December 2019, Appendix E-2, Table 4, Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County.

31 County of Los Angeles Department of Public Works, CoIWMP 2018 Annual Report, December 2019, pp. 50 and 51.

32 County of Los Angeles Department of Public Works, CoIWMP 2018 Annual Report, December 2019, p. 26.

33 County of Los Angeles Department of Public Works, CoIWMP 2018 Annual Report, December 2019, p. 32.

Of the 10 County Class III landfills serving the City, Sunshine Canyon landfill is the largest recipient of Class III solid waste. The maximum daily capacity for the landfill is approximately 12,100 tpd, and the 2018 disposal rate was approximately 6,765 tpd. As of December 31, 2018, Sunshine Canyon landfill had a remaining capacity of approximately 65.27 million tons and a remaining life expectancy of approximately 19 years.[34]

For the purpose of long-term disposal capacity planning, a Countywide diversion rate of 65 percent was assumed for 2018. Based on a total disposal of approximately 10.5 million tons (excluding inert waste and imports) and the 65 percent diversion rate, the County generated approximately 29.95 million tons of waste.[35]

(b) Unclassified Landfills

Unclassified landfills accept C&D waste, certain green (landscaping) waste, and concrete, asphalt, and similar materials that are chemically and biologically inactive. In 2018, the amount of inert waste materials disposed Countywide was 358,254 tons.[36]

As of 2018, there is only one permitted Inert Waste Landfill in Los Angeles County that has a full solid waste facility permit, which is the Azusa Land Reclamation Landfill.[37] The remaining capacity of this landfill is estimated at 46.17 million cubic yards (57.72 million tons) with a projected capacity exhaustion in 28 years.[38]

In addition to the County-permitted facility, there are a number of Inert Debris Engineered Fill Operation facilities operating under State permit provisions that provide additional capacity in the County, collectively processing approximately 2.60 million tons in 2018.[39]

34 County of Los Angeles Department of Public Works, CoIWMP 2018 Annual Report, December 2019, Appendix E-2, Table 4, Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County.

35 County of Los Angeles Department of Public Works, CoIWMP 2018 Annual Report, December 2019, p. 26.

36 County of Los Angeles Department of Public Works, CoIWMP 2018 Annual Report, December 2019, p. 25.

37 County of Los Angeles Department of Public Works, CoIWMP 2018 Annual Report, December 2019, p. 33.

38 County of Los Angeles Department of Public Works, CoIWMP 2018 Annual Report, December 2019, p. 33.

39 County of Los Angeles Department of Public Works, CoIWMP 2018 Annual Report, December 2019, p. 33.

(4) City of Los Angeles Waste Diversion and Recycling Efforts

As described in the Regulatory Framework, under SB 1374, AB 939, and AB 341, all cities and counties in the State are currently required to divert 50 percent of their solid waste streams from landfills; specifically per AB 341, this requirement will increase to 75 percent by 2020.[40] The County and multiple cities in the County (including the City of Los Angeles) have achieved the 50-percent goal, with the County diversion rate currently at 65 percent.

In 2001, the City adopted a 70-percent diversion rate goal by 2020. During his term of office, Mayor Antonio Villaraigosa revised the diversion rate goal to 75 percent by 2013, and the City adopted a new "zero waste-to-landfill" goal (zero waste) by the year 2025. The City had a diversion rate of 20.6 percent in 1990, 46 percent in 1995, 65.2 percent in 2000, and 67.1 percent by year 2005. By the end of 2011, the City achieved a diversion rate of 76.4 percent.[41] In 2011, the last reported year available, the City generated approximately nearly 16 million tons of potential solid waste.[42] Of this total, the City diverted approximately 12.2 million tons (76.4 percent) from disposal into landfills.[43]

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to solid waste if it would:

Threshold (a): ***Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; or***

Threshold (b): ***Not comply with federal, state, and local management and reduction statutes and regulations related to solid waste.***

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds

40 California Public Resources Code, Sections 41730 et seq.

41 City of Los Angeles, Zero Waste Progress Report, March 2013, p. 7.

42 4.2 pounds per person per day x 3,806,411 persons = 15,986,926 tons of potential solid waste based on data from the City of Los Angeles Zero Waste Progress Report, March 2013, p 8.

43 Diversion statistic based on data in generation data included in the City of Los Angeles, Zero Waste Progress Report, March 2013. Generation for 2011 (15,986,926 tons of potential solid waste) x 2011 diversion rate (76.4 percent) totals approximately 12.2 million tons of diverted waste materials.

Guide, as appropriate, to assist in answering the Appendix G Threshold questions. The factors to evaluate solid waste impacts include:

- Amount of project waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates.
- Need for an additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste.
- Whether the project conflicts with solid waste policies and objectives in the SRRE or its updates, the CiSWMPP, the City Framework, or the City Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

b) Methodology

The analysis of impacts on solid waste disposal addresses the amount of solid waste that would be generated by the proposed Project and whether sufficient landfill capacity is available to receive that solid waste. The amount of solid waste to be generated by the Project is estimated by applying the Thresholds Guide's solid waste generation factors to the proposed land uses and identifying the increase in solid waste generation at the Project Site under the proposed Project, taking the prevailing diversion rate into account. For conservative purposes, the analysis assume no waste is currently generated at the Project Site beyond the solid waste currently generated at the Capitol Records Complex, which is not being affected by the Project. As such, solid waste from the Capitol Records Complex is not analyzed herein. The analysis focuses on waste generation rates rather than disposal rates, which are reduced significantly by state and local diversion programs, and thus provides a conservative analysis of the impacts on solid waste facilities that would be caused by the Project. The availability of existing landfill capacity to accommodate this increase in solid waste is based on the existing and projected future remaining landfill capacity identified for County landfills in the CoIWMP 2018 Annual Report.

The analysis also addresses the proposed Project's consistency with policies and programs to increase diversion of solid waste from landfills and increase the recycling of materials in support of sustainability. Applicable policies and programs are summarized, and their goals and standards are noted. The proposed Project's characteristics are reviewed for consistency with those goals and standards.

c) Project Design Features

No specific Project Design Features are proposed with regard to solid waste.

d) Analysis of Project Impacts

Threshold (a): 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?

During construction and operation, the Project and the Project with the East Site Hotel Option would result in different solid waste generation amounts. Therefore, separate solid waste impact analyses are provided for the Project and the Project with the East Site Hotel Option under Threshold (a). However, conclusions regarding the impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

(1) Impact Analysis

(a) Construction Impacts

(i) Project

Project construction would include the demolition the approximately 1,237 square-foot existing building; existing hardscape consisting of concrete, asphalt, and soil; the export of approximately 542,300 cy of excavated soil (associated with excavation for new building foundations and subterranean parking on the West and East Sites); and new construction totaling approximately 1,287,150 square feet. These activities would generate demolition, excavation, and construction-related waste including, but not limited to, soil, asphalt, wood, paper, glass, plastic, metals, and cardboard that would be disposed of in the County's inert landfill site, Azusa Land Reclamation, or one of a number of inert debris engineered fill operations that are located throughout the County. Although unlikely, the Project construction-related C&D waste could be exported to out-of-county jurisdictions. Future use of the waste-by-rail system to the Mesquite Regional Landfill in Imperial County may also be considered.[44]

Table IV.N.3-1, *Estimated C&D Waste Generation for the Project,* provides an estimate of the amount of construction and demolition debris that would be generated during Project construction.

[44] County of Los Angeles Department of Public Works, CoIWMP 2018 Annual Report, December 2019, p. 40.

TABLE IV.N.3-1
ESTIMATED C&D SOLID WASTE GENERATION FOR THE PROJECT

Debris Type	Quantity[a]	Generation Factor	Waste Generation (tons)
Site Preparation			
Building Demolition Material	1,237 sf	0.0463 tons/sf[b]	57.27
Hardscape Demolition			
Asphalt	149,890 sf (3,701 cy)	2,700 lbs/cy	4,996.35
Soil	1,699 sf (84 cy)	2,200 lbs/cy	92.40
Exported Soil	542,300 cy	1.26 tons/cy	683,298.00
Site Preparation Subtotal	--	--	*688,444.02*
Building Construction			
Total New Building Area	1,287,150 sf	4.39 lbs/sf[c]	2,825.29
Total (pre-diversion)[d]			**691,269.32**
Total (post-diversion)[e]			**172,817.33**

sf = square feet; cy = cubic yards

a Excavation of hardscape assumes that asphalt is excavated to 8 inches and soil is excavated to 1 foot and 4 inches.

b One square-foot represents 0.0463 tons of waste material. CalEEMod User's Guide, Appendix A, October 2017, p. 13.

c Generation factors provided by the United States Environmental Protection Agency (USEPA), Estimating 2003 Building-Related Construction and Demolition Materials Amounts, Tables A-1, A-2, and A-3, 2003.

d Totals may not add up due to rounding.

e Based on the required diversion rate of 75 percent for C&D waste per the City's Green Building Code.

SOURCE: ESA, 2020.

As shown in Table IV.N.3-2, Project C&D activities would generate an estimated 691,269.32 gross tons of C&D waste prior to the diversion of 75 percent of C&D waste required by SB 1374 and required reductions associated with compliance with the City's Green Building Code (e.g., use of recyclables in building construction, etc.).

As required by City Ordinance No. 181,519 (Waste Hauler Permit Program), Project construction waste would be hauled by permitted haulers and taken only to City-certified C&D processing facilities that are monitored for compliance with recycling regulations. The inert solid waste and soil would require disposal at the County's only operating inert landfill, Azusa Land Reclamation, or at any of a number of state-permitted Inert Debris Engineered Fill Operations in the County,

such as the Arcadia Reclamation Facility. This does not include any asbestos-containing materials (ACMs), lead-based paints (LBPs), polychlorinated biphenyl (PCB), contaminated soil, or other contaminated waste of which would be disposed at facilities licensed to accept such waste. For further discussion of contaminated soil and waste, see Section IV.F, *Hazards and Hazardous Materials*, of this Draft EIR.

In compliance with the requirements of SB 1374 and Waste Hauler Permit Program, the Applicant would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Assuming the required C&D diversion rate of 75 percent per SB 1341 and Waste Hauler Permit Program, the Project is estimated to generate a total of approximately 172,817.33 tons of C&D waste. Additionally, the Project's construction contractor would deliver all C&D waste generated by the Project to a certified C&D Waste Processing Facility in accordance AB 939 Compliance Permit requirements, which is expected to further increase the diversion rate.

Pursuant to the Waste Hauler Permit Program, all C&D waste collected at the Project Site would be taken to a City-certified waste processing facility for sorting and final distribution and disposal. The C&D waste is anticipated to be disposed of at the County's Azusa Land Reclamation landfill or one of the Inert Debris Engineered Fill Operations located in the County that is permitted to receive C&D waste or exported to an out-of-county facility currently accepting waste from Los Angeles County. Given that the remaining disposal capacity of the Azusa Land Reclamation Facility is approximately 46.17 million cubic yards (57.72 million tons),[45] the Project's estimated total solid waste disposal need during construction after 75 percent diversion represents approximately 0.30 percent of the estimated remaining capacity at the Azusa Facility. This is a conservative estimate as it does not take into account the additional capacity provided by Inert Debris Engineered Fill Operations or the potential for reuse rather than disposal of the exported soil component of the proposed Project's C&D waste.

Based on the above, Project construction would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and impacts would be less than significant.

(ii) Project with the East Site Hotel Option

Under the Project with the East Site Hotel Option, site preparation activities would be the same as under the Project; however, the Project with the East Site Hotel Option would construct 14,409 square feet less than the Project. As depicted in

45 County of Los Angeles Department of Public Works, CoIWMP 2018 Annual Report, December 2019, p. 33.

Table IV.N.3.2, *Estimated C&D Solid Waste Generation for the Project with the East Site Hotel Option*, the Project with the East Site Hotel Option would generate less solid waste during C&D activities than the Project. **Therefore, for the same reasons as analyzed above, construction of the Project with the East Site Hotel Option would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and impacts would be less than significant.**

TABLE IV.N.3-2
ESTIMATED C&D SOLID WASTE GENERATION FOR THE PROJECT WITH THE EAST SITE HOTEL OPTION

Debris Type	Quantity[a]	Generation Factor[b]	Waste Generation (tons)
Site Preparation			
Building Demolition Material	1,237 sf	0.0463 tons/sf	57.27
Hardscape Demolition			
Asphalt	149,890 sf (3,701 cy)	2,700 lbs/cy	4,996.35
Soil	1,699 sf (84 cy)	2,200 lbs/cy	92.40
Exported Soil	542,300 cy	1.26 tons/cy	683,298.00
Site Preparation Subtotal	--	--	*688,444.02*
Building Construction			
Total New Building Area	1,272,741 sf	4.39 lbs/sf[c]	2,793.67
Total (pre-diversion)[d]			**691,237.69**
Total (post-diversion)[e]			**172,809.42**

sf = square feet; cy = cubic yards

[a] Excavation of hardscape assumes that asphalt is excavated to 8 inches and soil is excavated to 1 foot and 4 inches.

[b] One square foot represents 0.0463 tons of waste material. CalEEMod User's Guide, Appendix A, October 2017, p. 13.

[c] Generation factors provided by the USEPA, Estimating 2003 Building-Related Construction and Demolition Materials Amounts, Tables A-1, A-2, and A-3, 2003.

[d] Totals may not add up due to rounding.

[e] Based on the required diversion rate of 75 percent for C&D waste per the City's Green Building Code.

SOURCE: ESA, 2020.

(b) Operational Impacts

(i) Project

Estimated solid waste generation for Project operation is shown in **Table IV.N.3-3**, *Estimated Operational Solid Waste Generation under the Project*. As indicated therein, it is estimated that the Project would generate a total of approximately 2,639.01 tons of solid waste per year. This estimate does not take into account the amount of solid waste that would be diverted via source reduction and recycling programs within the City. As previously stated, the CoIWMP assumes an ongoing diversion rate throughout the County of 65 percent.[46] Therefore, assuming a diversion rate of 65 percent, Project operation would generate a total of 923.65 tons of solid waste per year requiring landfill disposal.

TABLE IV.N.3-3
ESTIMATED OPERATIONAL SOLID WASTE GENERATION UNDER THE PROJECT

Land Use	Quantity (sf)[a]	Daily Generation Factor[b]	Solid Waste Generation (lbs/day)	Solid Waste Generation (tons/year)
Proposed New Uses				
Residential	1,005 units	12.23 lb/unit	12,291.15	2,243.13
Retail/Restaurants	30,176 sf (206 emp)	10.53 lb/emp/day	2,169.18	395.88
Proposed Total[b]		**--**	**14,460.33**	**2,639.01**
Total (pre-diversion)[c]	**--**	**--**	**14,460.33**	**2,639.01**
Total (post-diversion)[d]	**--**	**--**	**5,061.12**	**923.65**

lb = pounds; sf = square feet; emp = employee

a Number of employees for the retail/restaurant use is provided in Section IV.J, *Population and Housing,* of the Draft EIR and as provided in the Economic and Fiscal Impact Report of the Economic Leadership Development Project (ELDP) Application prepared for the Project, provided in Appendix B of this Draft EIR.

b Generation factors are from the Thresholds Guide.

c Totals may not add up due to rounding.

d Based on an anticipated diversion rate of 65 percent for operations. This is conservative as actual diversion is likely to be higher with increasing compliance with the State's recycling goal of 75 percent by the year 2020.

SOURCE: ESA, 2020.

In 2027, the latest anticipated year of Project buildout, the County expects that approximately 104,572,217 additional tons of the remaining 163.39-million-ton capacity would be used in 2027 alone.[47] This would leave an available capacity of

46 County of Los Angeles Department of Public Works, CoIWMP 2018 Annual Report, December 2019, p. 26.

47 County of Los Angeles Department of Public Works, CoIWMP 2018 Annual Report, December 2019, Appendix E-2, Table 8, Los Angeles County Solid Waste Disposal Capacity Need Projection.

58,817,783 tons of capacity in 2027, assuming no additional disposal facilities are brought online or otherwise expanded to increase capacity. The Project's estimated annual pre-diversion solid waste generation of 2,639.01 tons requiring landfill disposal represents approximately 0.025 percent of the County's annual waste generation of 10,658,546 tons per year and approximately 0.0016 percent of the remaining 163.39-million-ton capacity in the County's Class III landfills. The Project's solid waste disposal would represent approximately 0.004 percent of the remaining capacity in 2027.

With diversion, the Project's annual solid waste generation that requires landfill disposal would represent approximately 0.009 percent of the County's annual waste generation and approximately 0.0006 percent of the remaining capacity in 2018. The Project, with diversion, would represent approximately 0.002 percent of the remaining capacity in 2027.

As previously stated in Subsection IV.N.3.2, Environmental Setting, the Sunshine Canyon Landfill is the primary recipient of Class III solid waste from the City. The maximum daily capacity for this landfill is 12,100 tpd, and the 2018 disposal rate was 6,765 tpd, indicating a remaining daily permitted capacity of 5,335 tpd of capacity. If all of the proposed Project's Class III solid waste were taken to Sunshine Canyon Landfill, the Project's addition of 8.46 tpd[48] would represent 0.16 percent of Sunshine Canyon's remaining daily permitted capacity, assuming no diversion. With diversion at the County's 65-percent rate, this percentage would drop to approximately 0.06 percent.

As described in the CoIWMP 2018 Annual Report, future disposal needs over the next 15-year planning horizon (2033) would be adequately met through the use of in-County and out-of-County facilities through a number of strategies that would be carried out over the years. It should also be noted that with annual reviews of demand and capacity in each subsequent Annual Report, the 15-year planning horizon provides sufficient lead time for the County to address any future shortfalls in landfill capacity.

Solid waste collection services are currently provided to the Project Site by haulers contracted by the City for this service area. Upon buildout, the Project would require the addition of a solid waste collection route for weekly service by LASAN (i.e., private haulers under contract to LASAN), and would be required to provide a minimum of two months' advance notice to LASAN to allow for integration into the weekly collection schedule. The Project would not require the expansion or construction of a new solid waste disposal or recycling facility to handle Project-

[48] Sunshine Canyon Landfill operates six days per week; 52 weeks * 6 days = 312 days. Therefore, the Project's daily disposal (based on the generation of solid waste 365 days per year) is calculated by taking the Project's annual total of 2,639.01 tons of solid waste generated and dividing by 312 days of disposal days, which amounts to 8.46 tpd.

generated waste because the existing facilities have enough capacity to receive the Project's waste.

Based on the above, the Project's operational waste generation would not exceed the permitted capacity of disposal facilities serving the Project and would not alter the ability of the County to address landfill needs via existing capacity and other planned strategies and measures for ensuring sufficient landfill capacity exists to meet the needs of the County. **Therefore, the County's City-certified waste processing facilities would have sufficient permitted capacity to accommodate the Project's operational waste disposal needs. 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, and impacts would be less than significant.**

(ii) Project with the East Site Hotel Option

Under the Project with the East Site Hotel Option, operation activities would differ from the Project in that residential units would be reduced in place of a 220-room hotel. As depicted in **Table IV.N.3-4**, *Estimated Operational Solid Waste Generation under the Project with the East Site Hotel Option*, the Project with the East Site Hotel Option would generate less operational solid waste than the Project. **Therefore, for the same reasons as analyzed above, operation of the Project with the East Site Hotel Option would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and impacts would be less than significant.**

(2) Mitigation Measures

Impacts regarding solid waste were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

(3) Level of Significance After Mitigation

Impacts regarding solid waste were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

TABLE IV.N.3-4
ESTIMATED OPERATIONAL SOLID WASTE GENERATION UNDER THE PROJECT WITH THE EAST SITE HOTEL OPTION

Land Use	Quantity (sf)[a]	Daily Generation Factor[b]	Solid Waste Generation (lbs/day)	Solid Waste Generation (tons/year)
Proposed New Uses				
Residential	768 units	12.23 lb/unit	9,392.64	1,714.16
Hotel	220 rooms (239 emp)	10.53 lb/emp/day	2,516.67	459.29
Retail/Restaurants	30,176 sf (206 emp)	10.53 lb/emp/day	2,169.18	395.88
Proposed Total[b]		**--**	**14,078.49**	**2,569.33**
Total (pre-diversion)[c]	**--**	**--**	**14,078.49**	**2,569.33**
Total (post-diversion)[d]	**--**	**--**	**4,927.47**	**899.27**

lb = pounds; sf = square feet; emp = employees

a Number of employees for the hotel and retail/restaurant uses are provided in Section IV.J, *Population and Housing*, of the Draft EIR and as provided in the Economic and Fiscal Impact Report of the ELDP Application prepared for the Project, provided in Appendix B of this Draft EIR.

b Generation factors are from the Thresholds Guide.

c Totals may not add up due to rounding.

d Based on an anticipated diversion rate of 65 percent for operations. This is conservative as actual diversion is likely to be higher with increasing compliance with the State's recycling goal of 75 percent by the year 2020.

SOURCE: ESA, 2019.

Threshold (b): Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

The Project and the Project with the East Site Hotel Option would comply with applicable solid waste-related regulations in a similar manner. Accordingly, Project-related impacts under Threshold (b) would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

(1) Impact Analysis

(a) Construction Impacts

The Project would comply with applicable statutes and regulations related to solid waste, including those pertaining to waste reduction and recycling. During construction, the Project would provide recycling containers on-site in accordance

with City's Recycling Space Allocation Ordinance. Additionally, the Project construction contractor would deliver all C&D waste generated by the Project to a certified Construction and Demolition Waste Processing Facility in accordance AB 939 Compliance Permit requirements. Thus, the Project would promote source reduction and recycling, consistent with the applicable federal, state, and local statutes and regulations related to solid waste. **Therefore, Project or Project with the East Site Hotel Option construction would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.**

(b) Operational Impacts

During Project operation, in accordance with the City's Recycling Space Allocation Ordinance, which requires that all new development projects provide an adequate recycling area or room for collecting and loading recyclable materials, the Project would provide on-site recycling collection facilities for the Project's occupants within the same area as the other "back-of-house" services for both the West Site and the East Site. The City has taken an aggressive stance on diverting solid waste from landfills, achieving 76.4 percent reduction in landfill deposited in 2011 with a goal of zero waste by 2025 through the implementation of programs with which the Project will comply.[49] **Therefore, the Project or the Project with the East Site Hotel Option would comply with applicable federal, state, and local management and reduction statues and regulations related to solid waste. Impacts would be less than significant.**

(2) Mitigation Measures

Impacts regarding solid waste were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

(3) Level of Significance After Mitigation

Impacts regarding solid waste services were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

The Project and the Project with the East Site Hotel Option would result in the substantially similar construction-related solid waste generation and impacts. Accordingly, cumulative construction solid waste impacts would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the cumulative construction impact analysis and impact

49 LASAN, Zero Waste Progress Report, March 2013, p. 7.

significance for the Project presented below are the same and also apply to the Project and the Project with the East Site Hotel Option.

The Project and the Project with the East Site Hotel Option would result in different operational solid waste generation amounts. Accordingly, separate operational solid generation calculations are included in the impact analysis for the Project and the Project with the East Site Hotel Option. However, conclusions regarding the cumulative operational impact analysis and impact significance for the Project presented below are the same and also apply to the Project and the Project with the East Site Hotel Option.

The Project and the Project with the East Site Hotel Option would comply with applicable solid waste-related regulations in a similar manner. Accordingly, cumulative impacts regarding consistency with applicable regulations would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the cumulative impact analysis and impact significance for the Project presented below regarding consistency with applicable regulations are the same and also apply to the Project and the Project with the East Site Hotel Option.

(1) Impact Analysis

Solid waste disposal in California is a regional issue administered by regional agencies, and for the Project, is administered by the County. As discussed in Subsection IV.N.3.2, Environmental Setting, the State requires that the Siting Element required as part of a jurisdiction's comprehensive solid waste management program show the provision of a minimum of 15 years of combined disposal capacity through existing or planned solid waste disposal and transformation facilities, or through additional strategies. Projected growth is included in the analysis and the required Annual Report updates the disposal demand and supply each year for the following 15-year period. The CoIWMP 2018 Annual Report anticipates an approximately 9.1 percent increase in population growth within the County of Los Angeles by 2033 and an increase of 13.1 percent in employment.[50] The cumulative development in the Project area would contribute an increment of the overall projected demand for waste disposal. Chapter III, *Environmental Setting,* of this Draft EIR, identifies 150 related projects, all of which would contribute waste to County landfills and to the demand for solid waste disposal during construction and operation.

(a) Construction

Similar to the Project, the related projects within the City would generate C&D waste and be subject to the Citywide Construction and Demolition Waste

50 County of Los Angeles Department of Public Works, CoIWMP 2018 Annual Report, Appendix E-2, Table 7, Population, Employment, Real Taxable Sales, and Waste Generation in Los Angeles County.

Recycling Ordinance and the Waste Hauler Permit Program, wherein the construction and demolition waste would be recycled to the extent feasible. The C&D waste resulting from construction activities for the related projects is unknown and unquantifiable as each related project would result in differing amounts of demolition and soil excavation. The C&D waste would be disposed of at the County's Azusa Land Reclamation Landfill or one of the inert debris engineered fill operations located in the County. As indicated above, the remaining capacity of the Azusa Land Reclamation Landfill is estimated at 46.17 million cubic yards (57.72 million tons). Additional capacity would also be provided by inert debris engineered fill operations or the potential for reuse rather than disposal of exported soil. Given this available future capacity, it is expected that all C&D waste can be accommodated during that time, and cumulative impacts regarding the disposal of C&D waste would not occur.

Additionally, as required by City Ordinance No. 181,519 (Waste Hauler Permit Program), construction waste would be hauled by permitted haulers and taken only to City-certified C&D processing facilities that are monitored for compliance with recycling regulations. The related projects would also be required to comply with SB 1374 and City Ordinance No. 181,519, which requires the related projects to implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. The related projects' respective construction contractors would deliver all C&D waste generated by those projects to a certified C&D Waste Processing Facility in accordance AB 939 Compliance Permit requirements, which is expected to further increase the diversion rate.

Moreover, the CoIWMP 2018 Annual Report concludes that there is adequate capacity in permitted solid waste facilities to serve the County through the 15-year planning period of 2018 through 2033.[51] **For these reasons, the Project's or the Project with the East Site Hotel Option's contribution to cumulative impacts would not be cumulatively considerable. As such, cumulative impacts would be less than significant.**

(b) Operation

As shown in **Table IV.N.3-5,** *Estimated Cumulative Operational Solid Waste Generation*, the estimated solid waste requiring landfill disposal for all 150 related projects, not accounting for diversion and recycling, would be 952,023.99 pounds per day or 173,744.38 tons per year. The cumulative yearly disposal for the related projects with the Project (pre-diversion) would be 966,484.32 pounds per day or 176,383.39 tons per year. The cumulative yearly disposal for the related projects with the Project with the East Site Hotel Option (pre-diversion) would be 966,102.48 pounds per day or 176,313.70 tons per year. Again, these estimates

51 County of Los Angeles Department of Public Works, CoIWMP 2018 Annual Report, December 2019, p. 6.

do not take into account the amount of solid waste that would be diverted by the related projects via source reduction and recycling programs, assumed by the County to be approximately 65 percent.

TABLE IV.N.3-5
ESTIMATED CUMULATIVE OPERATIONAL SOLID WASTE GENERATION

Land Use	Quantity[a]	Daily Generation Factor[b]	Solid Waste Generation (lbs/day)	Solid Waste Generation (tons/year)
Residential	16,902 units	12.23 lb/unit	196,805.16	35,916.94
Retail/Restaurant[c]	3,378,.37 ksf (9,155 emp)	10.53 lb/emp	96,402.15	17,593.39
Hotel	4,898 rooms (3,785 emp)	10.53 lb/emp	39,856.05	7,273.73
Office	7,104.02 ksf (33,990 emp)	10.53 lb/emp	357,914.70	65,319.43
Schools	540 students (64 emp)	10.53 lb/emp	673.92	122.99
Other Services[d]	6,096.73 ksf (29,157 emp)	8.93 lb/emp	260,372.01	47,517.89
Related Projects Subtotal (without Project)[e]			**952,023.99**	**173,744.38**
Project Total (Pre-Diversion)[f]			*14,460.33*	*2,639.01*
Cumulative Total with Project (Pre-Diversion)			**966,484.32**	**176,383.39**
Cumulative Total with Project (Post-65% Diversion)			**338,269.51**	**61,734.19**
Project with the East Site Hotel Option Total (Pre-Diversion)[g]			*14,078.49*	*2,569.32*
Cumulative Total with Project with East Site Hotel Option			**966,102.48**	**176,313.70**
Cumulative Total with Project with the East Site Hotel Option (Post-65% Diversion)			**338,135.87**	**61,709.80**

lb = pounds; ksf = thousand square feet; sf = square feet; emp = employees

[a] Number of employees per use, as applicable, are detailed in Section IV.J, *Population and Housing*, of the Draft EIR.

[b] Generation factors provided by the Thresholds Guide.

[c] Retail/Restaurant uses include retail, restaurant, cinema, and clubs.

[d] "Other Services" include various uses that do not have specific generation rates, such as other, health club, theater, and park.

[e] Totals may not add up precisely due to rounding.

[f] Project amount is taken from Table IV.N.3-3 of this section.

[f] Project amount is taken from Table IV.N.3-4 of this section.

SOURCE: ESA, 2019.

As the County's Class III landfills serve the entire County of Los Angeles, the Project plus the 150 related projects would represent only a small portion of the overall regional service area. The solid waste generation by the Project and related

projects represents only a fraction of the available capacity that could be accommodated at the landfills serving them. The cumulative annual solid waste generation by the Project or the Project with the East Site Hotel Option, without accounting for diversion, would be a negligible increment of the County's annual waste generation of 10,658,546 tons per year (1.65 percent) and remaining 163.39-million-ton capacity in the County's Class III landfills (0.11 percent). Accordingly, the cumulative contributions of the Project plus the related projects would not approach, much less exceed, the available capacity of existing facilities.

As noted above, the CoIWMP 2018 Annual Report indicates that in-County and out-of-County facilities would adequately meet future disposal needs over the next 15-year planning horizon (2033) through a number of strategies that would be carried out during that period. Through planning horizon year 2033, the County expects total solid waste generation Countywide to total approximately 176,142,361 tons, which accounts for the 65 percent diversion.[52]

The approximately 176,383.39 tons of solid waste estimated to be generated by the Project (more conservative scenario) and 150 related projects (pre-diversion) would account for approximately 0.10 percent of the County's expected total solid waste generation through 2033. Assuming a diversion rate of 65 percent, the Project and 150 related projects would generate approximately 61,734.19 tons requiring disposal, which would account for approximately 0.04 percent of the County's expected total solid waste generation through 2033. Therefore, solid waste generation by the Project and 150 related projects would leave available capacity in 2033 to serve the County.

As discussed above, Project-level impacts related to solid waste disposal would be less than significant. The CoIWMP accounts for cumulative waste generation for the 15-year planning period ending in 2033, as the analysis includes projected growth. Therefore, cumulative development would not alter the County's ability to address landfill needs via existing capacity and other options for increasing capacity. **Therefore, based on the analysis above, the Project's or the Project with the East Site Hotel Option's contribution to cumulative impacts would not be cumulatively considerable. As such, cumulative impacts on solid waste would be less than significant.**

(c) Consistency with Applicable Regulations

Similar to the Project, related projects would be required to comply with applicable regulations related to solid waste, including those pertaining to waste reduction, recycling, and diversion. Compliance with mandated waste reduction and diversion requirements would be required for each related project on a project-by-project basis at the time of plan submittal to their respective jurisdictions and would be

52 County of Los Angeles Department of Public Works, CoIWMP 2018 Annual Report, December 2019, Appendix E-2, Table 8, Los Angeles County Solid Waste Disposal Capacity Need Projection.

reviewed pursuant to their respective City or County's Green Building Code, as applicable. Each project and jurisdiction would be required to comply with State and County regulations governing solid waste and, as such, would be obligated to implement source reduction, reuse, and recycling in compliance with these regulations. As documented in the 2018 CoIWMP Annual Report, the trend in solid waste disposal between 2005 and 2010 was consistently downward, plateaued between 2010 and 2014, and has increased only gradually since 2014 despite considerable economic growth in the region. Nonetheless, there has been an overall reduction between 2007 and 2017 of approximately 1 million tons of solid waste due to the reduction in waste disposal at in-county facilities, likely due to the County's solid waste management efforts, markets for recyclable materials, development of alternative technology facilities, diversion credit for such facilities, and the State's 75 percent recycling goal. Overall disposal volumes therefore remain relatively low as the result of compliance with increasingly stringent state, county, and local diversion goals, a trend that is expected to continue as more stringent waste diversion requirements and other strategies and technologies that promote alternatives to disposal are implemented. **Therefore, the Project's or the Project with the East Site Hotel Option's contribution to cumulative impacts would not be cumulatively considerable. As such, cumulative impacts on solid waste would be less than significant.**

(2) Mitigation Measures

Cumulative impacts regarding solid waste were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

(3) Level of Significance After Mitigation

Cumulative impacts with regard to solid waste were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

IV. Environmental Impact Analysis

O. Energy Conservation and Infrastructure

1. Introduction

In accordance with the intent of Appendix F and Appendix G of the California Environmental Quality Act (CEQA) Guidelines, this Draft Environmental Impact Report (EIR) analyzes the energy implications of the Project, focusing on the following three energy resources: electricity, natural gas, and transportation-related energy (petroleum-based fuels). This section includes a summary of the Project's anticipated energy needs (detailed calculations of which can be found in Appendix Q of this Draft EIR), and conservation measures that are included as part of the Project.[1] Calculations also take into account peak energy calculations, provided in Exhibit 5 of the Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Utility Technical Report) prepared for the Project by KPFF Consulting Engineers (see Appendix P-1 of this Draft EIR). Information found herein, as well as other aspects of the Project's environmental-related energy impacts, are discussed in greater detail elsewhere in this Draft EIR, including in Chapter II*, Project Description* (see Subsection II.7.h), Section IV.E, *Greenhouse Gas Emissions*, and Section IV.N.2, *Water Supply*.

This section provides the content and analysis required by Public Resources Code (PRC), Section 21100(b)(3) and described in Appendix F to the CEQA Guidelines.[2] Public Resources Code Section 21100(b) and Section 15126.4 of the CEQA Guidelines require that an EIR identify mitigation measures to minimize a project's significant effects on the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy. Appendix F of the CEQA Guidelines states that the potential energy implications of a project shall be considered in an EIR, to the extent relevant and applicable to the project. Appendix F further indicates that a project's energy consumption and proposed conservation measures may be addressed, as relevant and applicable, in the Project Description, Environmental Setting and Impact Analysis portions of technical sections, as well as through mitigation measures and alternatives.

1 KPFF Consulting Engineers, Hollywood Center Utility Infrastructure Technical Report: Water, Wastewater and Energy (Utility Technical Report), January 3, 2019. Provided in Appendix P-1 of this Draft EIR.

2 14 California Code of Regulations, Sections 15000 et seq.

2. Environmental Setting

a) Regulatory Framework

(1) Federal

Established by the U.S. Congress in 1975, the Corporate Average Fuel Economy standards reduce energy consumption by increasing the fuel economy of cars and light trucks. The National Highway Traffic Safety Administration (NHTSA) and United States Environmental Protection Agency (USEPA) jointly administer the Corporate Average Fuel Economy standards. The U.S. Congress has specified that Corporate Average Fuel Economy standards must be set at the "maximum feasible level" with consideration given for: (1) technological feasibility; (2) economic practicality; (3) effect of other standards on fuel economy; and (4) need for the nation to conserve energy.[3]

Fuel efficiency standards for medium- and heavy-duty trucks have been jointly developed by USEPA and NHTSA. The Phase 1 heavy-duty truck standards apply to combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles for model years 2014 through 2018, and result in a reduction in fuel consumption from 6 to 23 percent over the 2010 baseline, depending on the vehicle type.[4] USEPA and NHTSA have also adopted the Phase 2 heavy-duty truck standards, which cover model years 2021 through 2027 and require the phase-in of a 5 to 25 percent reduction in fuel consumption over the 2017 baseline depending on the compliance year and vehicle type.[5]

(2) State

(a) Senate Bill 1389

Senate Bill (SB) 1389 (PRC Sections 25300–25323; SB 1389) requires the California Energy Commission (CEC) to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing the state's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the state's economy; and protect public health and safety (PRC Section 25301[a]). The 2015 Integrated Energy Policy Report provides the results of the CEC's assessments of a variety of energy issues facing California including energy efficiency, strategies related to data for improved decisions in the Existing Buildings Energy Efficiency Action Plan, building energy efficiency standards, the impact of drought on California's energy system, achieving 50 percent renewables by 2030, the California Energy Demand Forecast, the

3 National Highway Traffic Safety Administration, Corporate Average Fuel Economy, https://www.nhtsa.gov/laws-regulations/corporate-average-fuel-economy, accessed January 7, 2019.

4 United States Environmental Protection Agency (USEPA), Fact Sheet: EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles, August 2011.

5 USEPA, Federal Register/Vol. 81, No. 206/Tuesday, Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles—Phase 2, October 25, 2016.

Natural Gas Outlook, the Transportation Energy Demand Forecast, Alternative and Renewable Fuel and Vehicle Technology Program benefits updates, update on electricity infrastructure in Southern California, an update on trends in California's sources of crude oil, an update on California's nuclear plants, and other energy issues.

(b) California's Renewables Portfolio Standard

The State of California has adopted standards to increase the percentage that retail sellers of electricity, including investor-owned utilities and community choice aggregators, must provide from renewable sources. The standards are referred to as the Renewables Portfolio Standard (RPS). and require retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent by 2020.[6]

On September 10, 2018, Governor Jerry Brown signed SB 100, which supersedes prior legislation and requires retail sellers and local publicly owned electric utilities to procure eligible renewable electricity for 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030, and that the California Air Resources Board (CARB) should plan for 100 percent eligible renewable energy resources and zero-carbon resources by December 31, 2045. The California Public Utilities Commission (CPUC) and the CEC jointly implement the RPS program. The CPUC's responsibilities include: (1) determining annual procurement targets and enforcing compliance; (2) reviewing and approving each investor-owned utility's renewable energy procurement plan; (3) reviewing contracts for RPS-eligible energy; and (4) establishing the standard terms and conditions used in contracts for eligible renewable energy.[7] Refer to Section IV.E, *Greenhouse Gas Emissions*, of this Draft EIR for additional details regarding this regulation.

(c) California Building Standards Code (Title 24)

(i) California Building Energy Efficiency Standards (Title 24, Part 6)

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 and 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 2016 Title 24 standards, which became effective on January 1, 2017.[8] The 2016 Title 24 standards include efficiency improvements to the residential standards for attics, walls, water heating, and lighting, and efficiency improvements to the non-residential standards that include alignment with

6 Center for Climate Strategies, Executive Order S-14-08.

7 California Public Utilities Commission (CPUC), RPS Program Overview, 2018, http://www.cpuc.ca.gov/RPS_Overview/, accessed January 7, 2019.

8 California Energy Commission (CEC), 2016 Building Energy Efficiency Standards, https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2016-building-energy-efficiency, accessed February 28, 2020.

the American Society of Heating and Air-Conditioning Engineers 90.1-2013 national standards.[9]

(ii) California Green Building Standards (Title 24, Part 11)

The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as the CALGreen Code, includes mandatory measures for non-residential development related to site development; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality.[10] Recent changes to the CALGreen Code were related to the definitions and to the clarification or addition of referenced manuals, handbooks, and standards. For example, several definitions related to energy that were added or revised affect electric vehicle (EV) chargers and charging and hot water recirculation systems. For new multi-family dwelling units, the residential mandatory measures were revised to provide additional EV charging requirements, including quantity, location, size, single EV space, multiple EV spaces, and identification. For non-residential mandatory measures, the number of required EV charging spaces has been revised in its entirety. Refer to Section IV.E, *Greenhouse Gas Emissions*, of this Draft EIR for additional details regarding these standards.

(d) California Assembly Bill 1493 (AB 1493, Pavley)

In response to the transportation sector accounting for more than half of California's carbon dioxide (CO_2) emissions, Assembly Bill (AB) 1493 (commonly referred to as CARB's Pavley regulations), enacted on July 22, 2002, requires CARB to set greenhouse gas (GHG) emission standards for new passenger vehicles, light duty trucks, and other vehicles manufactured in and after 2009 whose primary use is non-commercial personal transportation. Phase I of the legislation established standards for model years 2009–2016 and Phase II established standards for model years 2017-2025.[11,12] Refer to Section IV.E, *Greenhouse Gas Emissions*, of this Draft EIR for additional details regarding this regulation. In September 2019, the USEPA published the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule in the federal register (Federal Register, Vol. 84, No. 188, Friday, September 27, 2019, Rules and Regulations, 51310-51363) that maintains the vehicle miles per gallon standards applicable in model year 2020 for model years 2021 through 2026. California and 23 other states and environmental groups in November 2019 in U.S. District Court in Washington, filed a petition for the EPA to reconsider the published rule. The Court has not yet ruled on these lawsuits.

9 CEC, 2016 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, June 2015.

10 California Building Standards Commission, Guide to the 2016 California Green Building Standards Code Nonresidential, January 2017.

11 California Air Resources Board (CARB), Clean Car Standards - Pavley, Assembly Bill 1493, https://ww2.arb.ca.gov/californias-greenhouse-gas-vehicle-emission-standards-under-assembly-bill-1493-2002-pavley, accessed February 29, 2020.

12 USEPA, EPA and NHTSA Set Standards to Reduce Greenhouse Gases and Improve Fuel Economy for Model Years 2017-2025 Cars and Light Trucks, 2012.

(e) California Health and Safety Code (HSC), Division 25.5 – California Global Warming Solutions Act of 2006

In 2006, the California State Legislature adopted AB 32 (codified in the California HSC, Division 25.5 – California Global Warming Solutions Act of 2006), which focuses on reducing GHG emissions in California to 1990 levels by 2020. Under HSC Division 25.5, CARB has the primary responsibility for reducing the State's GHG emissions; however, AB 32 also tasked the CEC and the CPUC with providing information, analysis, and recommendations to CARB regarding strategies to reduce GHG emissions in the energy sector.

In 2016, the California State Legislature adopted SB 32 and its companion bill AB 197; both were signed by Governor Brown. SB 32 and AB 197 amend HSC Division 25.5 and establish a new climate pollution reduction target of 40 percent below 1990 levels by 2030 and include provisions to ensure that the benefits of the State's climate policies reach into disadvantaged communities. Refer to Section IV.E, *Greenhouse Gas Emissions*, of this Draft EIR for additional details regarding these regulations.

(f) Senate Bill 350

SB 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. The objectives of SB 350 are: (1) to increase the procurement of electricity from renewable sources from 33 percent to 50 percent; and (2) to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.[13]

(g) California Air Resources Board

(i) CARB's Advanced Clean Car Program

The Advanced Clean Cars emissions-control program was approved by CARB in 2012 and is closely associated with the Pavley regulations.[14] The program requires a greater number of zero-emission vehicle models for years 2015 through 2025 to control smog, soot and GHG emissions. This program includes the Low-Emissions Vehicle regulations to reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles; and the Zero-Emissions Vehicle regulations to require manufactures to produce an increasing number of pure ZEV's (meaning battery and fuel cell electric vehicles) with the provision to produce plug-in hybrid electric vehicles between 2018 and 2025.

[13] As mentioned under Subsection IV.O.2.a)(2)(b), *California's Renewables Portfolio Standard*, on September 10, 2018, Governor Jerry Brown signed SB 100, which further increased California's Renewables Portfolio Standard to achieve 50% renewable resources by December 31, 2026, and achieve a 60% target by December 31, 2030. See Subsection IV.O.2.a)(2)(b), *California's Renewables Portfolio Standard* for additional details.

[14] CARB, Clean Car Standards – Pavley, Assembly Bill 1493.

(ii) Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling

In 2004, CARB adopted an Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling in order to reduce public exposure to diesel particulate matter emissions (Title 13 California Code of Regulations [CCR] Section 2485). The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than five minutes at any given location. While the goal of this measure is primarily to reduce public health impacts from diesel emissions, compliance with the regulation also results in energy savings in the form of reduced fuel consumption from unnecessary idling.

(iii) Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and other Criteria Pollutants, from In-Use Heavy-Duty Diesel-Fueled Vehicles

The goals of regulations to reduce emissions from in-use heavy duty diesel-fueled vehicles are primarily to reduce public health impacts from diesel emissions; however, compliance with such regulations has shown an increase in energy savings in the form of reduced fuel consumption from more fuel-efficient engines.[15]

In 2008, CARB approved the Truck and Bus regulation to reduce nitrogen oxide (NO_X), respirable particulate matter (PM10), and fine particulate matter (PM2.5) emissions from existing diesel vehicles operating in California (13 CCR, Section 2025). The phased regulation aims to reduce emissions by requiring installation of diesel soot filters and encouraging the retirement, replacement, or retrofit of older engines with newer emission-controlled models, which would make the vehicles more fuel efficient than vehicles older engines. The phasing of this regulation has full implementation by 2023.

CARB also promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower such as bulldozers, loaders, backhoes and forklifts, as well as many other self-propelled off-road diesel vehicles. The In-Use Off-Road Diesel-Fueled Fleets regulation adopted by CARB on July 26, 2007 aims to reduce emissions by installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models, which would make the equipment more fuel efficient than equipment with older engines (13 CCR Section 2449). The compliance schedule requires full implementation by 2023 in all equipment for large and medium fleets and by 2028 for small fleets.

15 For Construction Pros, Cummins Tier-4-Final Field Test Showed 10% Lower Fuel Consumption, March 5, 2014, https://www.forconstructionpros.com/equipment/fleet-maintenance/diesel-engines/press-release/11323000/cummins-inc-cummins-tier4final-field-test-showed-10-lower-fuel-consumption, accessed January 7, 2019.

(h) Sustainable Communities Strategy

Adopted by the State on September 30, 2008, the Sustainable Communities and Climate Protection Act of 2008, or SB 375, establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions. Pursuant to SB 375, On April 7, 2016, the Southern California Association of Governments (SCAG) adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS), which achieves and exceeds the GHG emission-reduction targets set by CARB by demonstrating an 8 percent reduction in vehicular emissions by 2020, an 18 percent reduction by 2035, and a 21 percent reduction by 2040 as compared to the 2005 level on a per capita basis. Compliance with and implementation of 2016-2040 RTP/SCS policies and strategies would have the co-benefits of reducing per capita vehicle miles traveled (VMT) and corresponding decreases in per capita transportation-related fuel consumption. Information regarding the applicable RTP/SCS for the region in which this Project is located is provided below in Subsection IV.O.2(3)(b). In addition, refer to Section IV.E, *Greenhouse Gas Emissions*, of this Draft EIR for additional details regarding the RTP/SCS.

(i) California Environmental Quality Act

In accordance with CEQA and Appendix F, Energy Conservation, of the CEQA Guidelines, and to assure that energy implications are considered in project decisions, EIRs are required to propose mitigation measures to minimize the significant effects on the environment, including measures to reduce the inefficient, wasteful, and unnecessary consumption of energy. Appendix F of the CEQA Guidelines provides a list of energy-related topics that should be analyzed in the EIR. In addition, while not described or required as significance thresholds for determining the significance of impacts related to energy, Appendix F provides the following topics for consideration in the discussion of energy use in an EIR, to the extent the topics are applicable or relevant to the Project:

- The Project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed;
- The effects of the Project on local and regional energy supplies and on requirements for additional capacity;
- The effects of the Project on peak and base period demands for electricity and other forms of energy;
- The degree to which the Project complies with existing energy standards;
- The effects of the Project on energy resources; and
- The Project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

(3) Regional

(a) Southern California Gas Company

The Southern California Gas Company (SoCalGas), who is the natural gas retailer for the Project, along with five other California utility providers, released the *2018 California Gas Report*, presenting a forecast of natural gas supplies and requirements for California through the year 2035. This report predicts gas demand for all sectors (residential, commercial, industrial, energy generation and wholesale exports) and presents best estimates, as well as scenarios for hot and cold years. Overall, SoCalGas predicts a decrease in natural gas demand in future years due to a decrease in per capita usage, energy efficiency policies, and the State's transition to renewable energy displacing fossil fuels including natural gas.[16]

(b) Southern California Association of Governments

The Project Site is located within the planning jurisdiction of the Southern California Association of Governments (SCAG), as is all of Los Angeles. Pursuant to SB 375, SCAG prepared its first-ever SCS that was included in the *2012-2035 Regional Transportation Plan/Sustainable Communities Strategy* (2012-2035 RTP/SCS), which was adopted by SCAG in April 2012. The goals and policies of that SCS demonstrated a reduction in per capita vehicle miles traveled (VMT) (and a corresponding decrease in per capita transportation-related fuel consumption) and focused on transportation and land use planning strategies that included encouraging infill projects, locating residents closer to where they work and play, and designing communities with access to high quality transit services.

SCAG has since adopted the *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy* (2016-2040 RTP/SCS).[17] The goals and policies of the 2016-2040 RTP/SCS build from the previous 2012-2035 RTP/SCS and provide updated strategies for reducing per capita VMT. These strategies include supporting projects that encourage diverse job opportunities for a variety of skills and levels of education, recreation and a full-range of shopping, entertainment and services all within a relatively short distance; encouraging employment development around current and planned transit stations and neighborhood commercial centers; encouraging the implementation of a "Complete Streets" policy that meets the needs of all users of the streets, roads and highways including bicyclists, children, persons with disabilities, motorists, electric vehicles, movers of commercial goods, pedestrians, users of public transportation, and seniors; and supporting alternative-fueled vehicles. The 2016-2040 RTP/SCS also establishes High Quality Transit Areas (HQTA), which are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. Local jurisdictions are encouraged to focus housing and employment growth within HQTAs to reduce VMT. The

16 California Gas and Electric Utilities, 2018 California Gas Report, 2018, page 40.

17 Southern California Association of Governments (SCAG), 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS), April 2016.

Project Site is located within an HQTA as designated by the 2016-2040 RTP/SCS. Refer to Section IV.E, *Greenhouse Gas Emissions*, of this Draft EIR for additional details regarding the 2016-2040 RTP/SCS.

(4) Local

(a) Green New Deal

In April 2019, Mayor Eric Garcetti released L.A.'s Green New Deal (Sustainable City pLAn 2019). Rather than an adopted plan, the Green New Deal is a mayoral initiative that consists of a program of actions designed to create sustainability-based performance targets through 2050 that advance economic, environmental, and equity objectives.[18] L.A.'s Green New Deal (Sustainable City pLAn 2019) is the first four-year update to the City's first Sustainable City pLAn that was released in 2015. It augments, expands, and elaborates in even more detail L.A.'s vision for a sustainable future and it addresses climate change with accelerated targets and new aggressive goals.

While not a plan adopted solely to reduce GHG emissions, within the Green New Deal, climate mitigation is one of eight explicit benefits that help define its strategies and goals. These include reducing GHG emissions through near-term outcomes:

- Reduce potable water use per capita by 22.5 percent by 2025; 25 percent by 2035; and maintain or reduce 2035 per capita water use through 2050.
- Reduce building energy use per square feet for all building types 22 percent by 2025; 34 percent by 2035; and 44 percent by 2050 (from a baseline of 68 mBTU/sqft in 2015).
- All new buildings will be net zero carbon by 2030 and 100 percent of buildings will be net zero carbon by 2050.
- Increase cumulative new housing unit construction to 150,000 by 2025; and 275,000 units by 2035.
- Ensure 57 percent of new housing units are built within 1,500 feet of transit by 2025; and 75 percent by 2035.
- Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides or transit to at least 35 percent by 2025, 50 percent by 2035, and maintain at least 50 percent by 2050.
- Reduce VMT per capita by at least 13 percent by 2025; 39 percent by 2035; and 45 percent by 2050.
- Increase the percentage of electric and zero emission vehicles in the city to 25 percent by 2025; 80 percent by 2035; and 100 percent by 2050.

[18] City of Los Angeles, L.A.'s Green New Deal (Sustainable City pLAn 2019), 2019.

- Increase landfill diversion rate to 90 percent by 2025; 95 percent by 2035 and 100 percent by 2050.
- Reduce municipal solid waste generation per capita by at least 15 percent by 2030, including phasing out single-use plastics by 2028 (from a baseline of 17.85 lbs. of waste generated per capita per day in 2011).
- Eliminate organic waste going to landfill by 2028.
- Reduce urban/rural temperature differential by at least 1.7 degrees by 2025; and 3 degrees by 2035.
- Ensure proportion of Angelenos living within 1/2 mile of a park or open space at least 65 percent by 2025; 75 percent by 2035; and 100 percent by 2050.

(b) City of Los Angeles Green Building Code

On December 20, 2016, the Los Angeles City Council approved Ordinance No. 184,692, which amended Chapter IX of the Los Angeles Municipal Code (LAMC), referred to as the "Los Angeles Green Building Code," by amending certain provisions of Article 9 to reflect local administrative changes and incorporating by reference portions of the CALGreen Code. Projects filed on or after January 1, 2017, must comply with the provisions of the Los Angeles Green Building Code. Specific mandatory requirements and elective measures are provided for three categories: (1) low-rise residential buildings; (2) nonresidential and high-rise residential buildings; and (3) additions and alterations to nonresidential and high-rise residential buildings. Article 9, Division 5 includes mandatory measures for newly constructed nonresidential and high-rise residential buildings. Refer to Section IV.E, *Greenhouse Gas Emissions*, of this Draft EIR for additional details.

(c) City of Los Angeles Solid Waste Programs and Ordinances

The recycling of solid waste materials also contributes to reduced energy consumption. Specifically, when products are manufactured using recycled materials, the amount of energy that would have otherwise been consumed to extract and process virgin source materials is reduced. For example, in 2015, 3.61 million tons of aluminum were produced from recycled materials in the United States, saving enough energy to provide electricity to 7.5 million homes. In 1989, California enacted AB 939, the California Integrated Waste Management Act, which establishes a hierarchy for waste management practices such as source reduction, recycling, and environmentally safe land disposal.

The City has developed and is in the process of implementing, the Solid Waste Integrated Resources Plan, also referred to as the City's Zero Waste Plan, whose goal is to lead the City towards being a "zero waste" City by 2030. These waste reduction plans, policies, and regulations, along with Mayoral and City Council directives, have increased the level of waste diversion (e.g., recycling) for the City to 76 percent as of 2013.[19] The RENEW

[19] City of Los Angeles, Department of Public Works, LA Sanitation, Recycling, 2017, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=kq9mn3h5a_188, accessed January 7, 2019.

LA Plan, aims to achieve a zero waste goal through reducing, reusing, recycling, or converting the resources not going to disposal and achieving a diversion rate of 90 percent or more by 2025.[20] The City has also approved the Waste Hauler Permit Program (Ordinance No. 181,519, LAMC Chapter VI, Article 6, Section 66.32-66.32.5), which requires private waste haulers to obtain AB 939 Compliance Permits to transport construction and demolition waste to City-certified construction and demolition waste processors. The City's Exclusive Franchise System Ordinance (Ordinance No. 182,986), among other requirements, sets a maximum annual disposal level and diversion requirements for franchised waste haulers to promote waste diversion from landfills and support the City's zero waste goals. These programs reduce the number of trips to haul solid waste and therefore reduce the amount of petroleum-based fuels and energy used to process solid waste.

b) Existing Conditions

(1) Electricity

Electricity, a consumptive utility, is a man-made resource. The production of electricity requires the consumption or conversion of energy resources, including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources, into energy. The delivery of electricity involves a number of system components for distribution and use. The electricity generated is distributed through a network of transmission and distribution lines commonly called a power grid.

Energy capacity, or electrical power, is generally measured in watts (W) while energy use is measured in watt-hours (Wh). For example, if a light bulb has a capacity rating of 100 W, the energy required to keep the bulb on for 1 hour would be 100 Wh. If ten 100 W bulbs were on for 1 hour, the energy required would be 1,000 Wh or 1 kilowatt-hour (kWh). On a utility scale, a generator's capacity is typically rated in megawatts (MW), which is one million watts, while energy usage is measured in megawatt-hours (MWh) or gigawatt-hours (GWh), which is one billion watt-hours.

LADWP provides electrical service throughout the City, including to the Project Site, and many areas of the Owens Valley, serving approximately 4 million people within a service area of approximately 465 square miles, excluding the Owens Valley. Electrical service provided by LADWP is divided into two planning districts: Valley and Metropolitan. The Valley Planning District includes the LADWP service area north of Mulholland Drive, and the Metropolitan Planning District includes the LADWP service area south of Mulholland Drive. The Project Site is located within LADWP's Metropolitan Planning District.

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. According to LADWP's 2017 Power Strategic Long-Term Resource Plan,

20 City of Los Angeles, RENEW LA, Five-Year Milestone Report, 2011.

LADWP has a net dependable generation capacity greater than 7,531 MW.[21] On August 31, 2017, LADWP's power system experienced a record instantaneous peak demand of 6,502 MW.[22] Approximately 32 percent of LADWP's 2018 electricity purchases were from renewable sources, which is similar to the 31 percent statewide percentage of electricity purchases from renewable sources.[23] The annual electricity sale to customers for the 2017-2018 fiscal year was approximately 22,383 million kWh.[24]

The portions of the Project Site that are proposed for development are largely vacant and currently do not generate electrical demand. The northern part of the West Site contains an approximately 1,237-square-foot single-story building that is leased by the American Musical and Dramatic Academy (AMDA) and used on a daily basis for sets and prop storage. Because the amount of energy used in this building is minimal, and to provide a conservative analysis, it is assumed that there is no existing energy demand from this use. The remaining part of the West Site (approximately 78,512 square feet) contains a surface parking lot with a parking attendant kiosk that do not use electricity, with the exception of nighttime parking lot lighting. The East Site contains the 114,043-square-foot Capitol Records Complex, which, while it does have an existing electrical demand, its electrical demand would not be affected by the Project. The remaining part of the East Site consists of asphalt surface parking that does not use electricity, with the exception of nighttime parking lot lighting.

For the purposes of this analysis, no existing operational energy demand is assumed from the existing AMDA-leased facility on the West Site because it is unknown whether the facility would relocate to another location and continue to operate. In addition, since the Capitol Records Complex on the East Site would continue to operate as under existing conditions, this analysis assumes the existing East Site operations would continue to require the same energy demand requirements with or without the Project. Furthermore, as a conservative approach, no energy demand credit is taken from the existing nighttime parking lot lighting. Therefore, existing operational energy consumption from the consumption of electricity is not required to be calculated and the Project's energy demand would conservatively be considered new.

(2) Natural Gas

Natural gas is a combustible mixture of simple hydrocarbon compounds (primarily methane) that is used as a fuel source. Natural gas consumed in California is obtained

21 Los Angeles Department of Water and Power (LADWP), 2017 Power Strategic Long-Term Plan, 2017, page 17.

22 LADWP, Facts & Figures. https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures;jsessionid=pqWFphbDVQl6nn64grJd2nwyYMxXnmxfKdvrGFbhBGK17VvPT7XT!-420070889?_adf.ctrl-state=xk0dbq6vu_4&_afrLoop=33615106682444&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D33615106682444%26_afrWindowMode%3D0%26_adf.ctrl-state%3D1264kpunwa_4, accessed February 29, 2020.

23 LADWP, Power Content Label, Version: July 2019.

24 LADWP, 2018 Retail Electric Sales and Demand Forecast, November 2018.

from naturally occurring reservoirs and delivered through high-pressure transmission pipelines. Natural gas provides almost one-third of the State's total energy requirements. Natural gas is measured in terms of cubic feet (cf).

Natural gas is provided to the Project Site by SoCalGas, which is the principal distributor of natural gas in Southern California, serving residential, commercial, and industrial markets. SoCalGas serves approximately 21.6 million customers in more than 500 communities encompassing approximately 20,000 square miles throughout Central and Southern California, from the City of Visalia to the U.S./Mexican border.[25]

SoCalGas receives gas supplies from several sedimentary basins in the western United States and Canada, including supply basins located in New Mexico (San Juan Basin), West Texas (Permian Basin), the Rocky Mountains, and Western Canada as well as local California supplies.[26] The traditional, southwestern United States sources of natural gas will continue to supply most of SoCalGas' natural gas demand. The Rocky Mountain supply is available but is used as an alternative supplementary supply source, and Canadian sources provide only a small share of SoCalGas supplies due to the high cost of transport.[27] Gas supply available to SoCalGas from California sources averaged 323 million cf per day in 2017 (the most recent year for which data are available).[28]

For the reasons discussed above, for the purposes of this analysis, no existing operational energy demand from the consumption of natural gas is assumed from the existing Project Site. Therefore, existing operational energy consumption is not required to be calculated and the Project's energy demand would conservatively be considered new.

(3) Transportation Energy

According to the CEC, transportation accounted for nearly 37 percent of California's total energy consumption in 2014.[29] In 2018, California consumed 15.5 billion gallons of gasoline and 3.7 billion gallons of diesel fuel.[30] Petroleum-based fuels currently account for more than 90 percent of California's transportation fuel use.[31] However, the state is now working on developing flexible strategies to reduce petroleum use. Over the last decade, California has implemented several policies, rules, and regulations to improve

25 SoCalGas, Company Profile, http://www.socalgas.com/about-us/company-info.shtml, accessed January 7, 2019.
26 California Gas and Electric Utilities, 2018 California Gas Report, 2018, page 40.
27 California Gas and Electric Utilities, 2018 California Gas Report, 2018, page 40.
28 California Gas and Electric Utilities, 2018 California Gas Report, 2018, page 32.
29 CEC, Final 2016 Integrated Energy Policy Report Update, docketed February 28, 2017, page 4. Based on the transportation sector accounting for 37 percent of the state's GHG emissions in 2014.
30 CEC, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2020, https://ww2.energy.ca.gov/almanac/transportation_data/gasoline/piira_retail_survey.html. Accessed March 9, 2020. Diesel is adjusted to account for retail (48 percent) and non-retail (52 percent) diesel sales.
31 CEC, 2016-2017 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program, May 2016.

vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHGs from the transportation sector, and reduce VMT. Accordingly, gasoline consumption in California has declined. The CEC predicts that the demand for gasoline will continue to decline over the next 10 years, and there will be an increase in the use of alternative fuels.[32] According to fuel sales data from the CEC, fuel consumption in Los Angeles County was approximately 3.64 billion gallons of gasoline and 0.53 billion gallons of diesel fuel in 2018.[33]

For the reasons discussed above, for the purposes of this analysis, no existing operational transportation fuel demand is assumed from the existing Project Site. Therefore, existing operational transportation fuel consumption is not required to be calculated and the Project's transportation fuel demand would conservatively be considered new.

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a project would have a significant impact related to energy if it would:

Threshold (a): Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or

Threshold (b): Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in Appendix G and Appendix F of the CEQA Guidelines, as appropriate, to assist in answering the Appendix G questions. The factors to evaluate energy impacts under Threshold (a) include:

- The Project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the Project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed;
- The effects of the Project on local and regional energy supplies and on requirements for additional capacity;
- The effects of the Project on peak and base period demands for electricity and other forms of energy;

32 CEC, 2015 Integrated Energy Policy Report, docketed June 29, 2016, page 113.

33 CEC, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2020. Diesel is adjusted to account for retail (48 percent) and non-retail (52 percent) diesel sales.

- The effects of the Project on energy resources; and
- The Project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

In accordance with Appendix G and Appendix F of the CEQA Guidelines, the degree to which the Project complies with existing energy standards is considered, as appropriate, to evaluate impacts under Threshold (b).

Appendix G of the State CEQA Guidelines also includes a threshold question in the Utilities and Service Systems section regarding electric power and natural gas facilities. Specifically, the threshold question states:

Threshold (c): 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.

The analysis for Threshold (c) provided below focuses on the electric power and natural gas components of this threshold question. The other components of this threshold question are addressed elsewhere in this Draft EIR, including Section IV.N.1, *Wastewater*, and Section IV.N.2, *Water Supply*.

b) Methodology

This analysis addresses the Project's potential energy usage, including electricity, natural gas, and transportation fuel. Energy consumption during both construction and operation is assessed. Specific analysis methodologies are discussed below. Energy calculations are provided in Appendix Q of this Draft EIR, and are based on the same assumptions as are used in Section IV.B, *Air Quality*, and Section IV.E, *Greenhouse Gas Emissions*, of this Draft EIR.

(1) Construction

Development of the Project would commence with construction on the West Site, followed by construction on the East Site, and eight construction phases within each of the sites (see Table II-4, Project Construction Schedule, in Chapter II, *Project Description*, of this Draft EIR). To allow for necessary flexibility in terms of construction scheduling, logistical site needs, and a conservative evaluation of potential construction-related environmental impacts, this Draft EIR considers two potential construction scenarios where applicable: a scenario where construction of the West and East Sites have some overlap (overlapping scenario, with shorter overall construction duration), and a scenario where construction of the West and East Sites are entirely separate and sequential where there would be no overlap (sequential construction scenario, with an extended construction duration). Under the overlapping construction scenario, the Utilities/Trenching, Site Preparation, and early Grading/Excavation phases could begin on the East Site while the West Site is in the Building Construction phase. In this overlapping construction scenario, construction could

be completed in approximately 4.5 years (beginning 2021 and complete in 2025). Under the sequential construction scenario, construction of the West and East Sites are entirely separate and sequential where there would be no overlap (sequential construction scenario, extended construction duration). In this scenario, construction would be completed over an approximately seven-year period (beginning in 2021 and completion in 2027).

If, for various site planning, financial, or other reasons, the onset of construction is delayed to a later date than assumed in the modeling analysis, construction impacts would be similar to or less than those analyzed, because a more energy-efficient and cleaner-burning construction equipment and vehicle fleet mix would be expected in the future due to State regulations requiring construction equipment fleet operators to phase-in less polluting heavy-duty equipment and trucks over time. For instance, as discussed above under Regulatory Framework, the CARB In-Use Off-Road Diesel-Fueled Fleets regulation aims to reduce emissions by installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer more efficient emission-controlled models (13 CCR Section 2449), which has a compliance schedule requiring full implementation by 2023 in all equipment for large and medium fleets and by 2028 for small fleets. As a result, should the Project or the Project with the East Site Hotel Option commence construction on a later date than modeled in this impact analysis, energy conservation and infrastructure impacts would be less than the impacts disclosed herein. Construction energy consumption would result primarily from transportation fuels (e.g., diesel and gasoline) used for haul trucks, heavy-duty construction equipment, and construction workers traveling to and from the Project Site. Construction activities can vary substantially from day to day, depending on the specific type of construction activity and the number of workers and vendors traveling to the Project Site. This analysis considers these factors and provides the estimated maximum construction energy consumption for the purposes of evaluating the associated impacts on energy resources.

(a) Electricity

Electricity usage associated with the supply and conveyance of water used for dust control during construction was calculated using data from the California Emissions Estimator Model (CalEEMod), which is a state-approved emissions model used for the Project's and the Project with the East Site Hotel Option's air quality and GHG emissions assessment. On a limited and incidental basis, electricity may be used for small equipment, such as lighting, electronic devices, and other minor construction activities necessitating electrical power; however, it is speculative to quantify these minor uses, and such equipment may already be in use under existing conditions (i.e., computer laptops and mobile phones already owned and in use by contractors). Furthermore, these sources would generally be negligible compared to the clearly new electricity usage associated with the supply and conveyance of water for construction dust control, which is quantified in this analysis.

(b) Natural Gas

Natural gas is not expected to be consumed during construction of the Project or the Project with the East Site Hotel Option because construction equipment would be primarily diesel-fueled. Therefore, natural gas associated with construction activities was not calculated.[34]

(c) Transportation Fuels

Energy use during construction is forecasted by assuming a conservative estimate of construction activities (i.e., maximum daily equipment usage levels). The energy usage required for Project construction was estimated based on information provided by the Project's contractor representative, which includes the number and type of construction equipment that would be used during Project construction, the estimated equipment operating hours for off-road equipment or VMT for on-road vehicles, and the estimated duration of construction activities. Energy for construction worker commuting trips was estimated based on the expected number of workers for the various phases of construction and the estimated VMT.

Construction equipment would primarily be diesel-fueled (with the exception of construction worker commute vehicles, which would primarily be gasoline-fueled). For purposes of this assessment, it is conservatively assumed that heavy-duty construction equipment and haul trucks would be diesel-fueled. This represents a worst-case scenario to cover maximum potential energy use during construction. The estimated fuel economy for heavy-duty construction equipment is based on fuel consumption factors from the CARB off-road vehicle (OFFROAD) emissions model, which is a state-approved model for estimating emissions from off-road heavy-duty equipment. The estimated fuel economy for haul trucks and worker commute vehicles is based on fuel consumption factors from the CARB Emission Factors (EMFAC) emissions model, which is a state-approved model for estimating emissions on-road vehicles and trucks. Both OFFROAD and EMFAC are incorporated into CalEEMod. Diesel and gasoline use from construction were then compared to the County of Los Angeles' total annual diesel and gasoline fuel use based on available 2017 data.

(2) Operation

Project buildout, which is when the new buildings would be occupied by residents and commercial/retail occupants, is anticipated for year 2024 at the earliest for the West Site. For the East Site, operational buildout is anticipated by 2025 at the earliest under the overlapping construction scenario, and by 2027 at the earliest under the sequential construction scenario. Both the Project and the Project with the East Site Hotel Option

[34] In general, natural gas would not be expected to be used and this energy analysis assumes heavy-duty construction equipment is diesel-fueled, as is typically the case. However, natural gas-fueled heavy-duty construction equipment could be used to replace some diesel-fueled heavy-duty construction equipment. If this does occur, diesel fuel demand would be slightly reduced and replaced by a small amount of temporary natural gas demand. This would not substantially affect the energy analysis or conclusions provided herein.

are considered in this analysis (see Chapter II, *Project Description*, of the Project's Draft EIR for additional details). Operation of the Project would require energy in the form of electricity and natural gas for building heating, cooling, cooking, lighting, water demand and wastewater treatment, consumer electronics, and other energy needs, and transportation-fuels, primarily gasoline, for vehicles traveling to and from the Project Site.

Energy usage from water demand (e.g., electricity used to supply, convey, treat, and distribute) is estimated based on the water demand quantities from the Project's Water Supply Assessment (WSA).[35] The assessment also includes a discussion of the Project's compliance with relevant energy-related regulations, Project Design Features GHG-PDF-1 and WS-PDF-1), and land use characteristics that would minimize the amount of transportation-related energy usage during operations (see Subsection IV.O.3.c, below). The energy usage takes into account building energy standards pursuant to the 2016 Title 24 Building Standards Code and CALGreen Code, which provides for a conservative analysis as compliance with future editions of the Title 24 Building Standards Code and CALGreen Code, as applicable, would be expected to result in lower building energy usage. These measures are also discussed in Chapter II, *Project Description*, Section IV.E, *Greenhouse Gas Emissions*, and Section IV.N.2, *Water Supply*, of this Draft EIR.

(a) Electricity

Building energy use factors from CalEEMod are used to estimate building energy use. CalEEMod inputs (land use type, square footage, location) affect the estimated energy use provided in the annual outputs of the model. Electricity from building energy and water conveyance were taken from the outputs and used as an estimate of the Project's overall electricity use. Water demand quantities were based on the WSA prepared for the Project by the LADWP (see also Appendix P-2 of this Draft EIR). The electricity use is then compared to LADWP's forecasted electricity use for the Project potential buildout years in 2024 for the West Site and in 2025 or 2027 for full buildout.

(b) Natural Gas

Similar to electricity, natural gas use is derived from CalEEMod outputs for the Project's annual natural gas consumption. The natural gas use is then compared to SoCalGas' forecasted natural gas use for the Project potential buildout years in 2024 for the West Site and in 2025 or 2027 for full buildout.

(c) Transportation Fuels

Energy for transportation from residents, visitors, and workers traveling to and from the Project Site is estimated based on the predicted number of trips to and from the Project Site, based on the Project's Transportation Assessment study and the estimated VMT.[36] The estimated fuel economy for vehicles is based on fuel consumption factors from the

[35] LADWP, Water Supply Assessment (WSA) for the Hollywood Center Project, December 11, 2018. Provided in Appendix P-2 of this Draft EIR.

[36] Fehr & Peers, Transportation Assessment for the Hollywood Center Project, March 2020. Provided in Appendix N-1 of this Draft EIR.

CARB EMFAC emissions model. EMFAC emission factors were generated for the Project potential buildout years in 2024 for the West Site and in 2025 or 2027 for full buildout. As discussed above, EMFAC is incorporated into CalEEMod. Gasoline and diesel use from operation were then compared to the County of Los Angeles' total annual gasoline and diesel fuel use based on available 2017 data.

c) Project Design Features and Project Characteristics

(1) Project Design Features

The Project would include Project Design Features designed to improve energy efficiency as set forth in Section IV.E, *Greenhouse Gas Emissions,* and Section IV.N.2, *Water Supply*, of this Draft EIR.

(2) Land Use Characteristics

As discussed in Section IV. B, *Air Quality*, and Section IV.E, *Greenhouse Gas Emissions*, the Project represents an infill development within an existing urbanized area that would concentrate new residential and neighborhood-serving commercial retail and restaurant uses within a Transit Priority Area (TPA), which is defined by the City as an area within one-half mile of a major transit stop that is existing or planned,[37] and within an HQTA, which is defined by the 2016-2040 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. The Project's location would result in reduced vehicle trips and VMT compared to a standard project of similar size and land uses without close access to off-site destinations and public transit stops. The Project Site is located within a quarter-mile of public transportation, including the Los Angeles County Metropolitan Transportation Authority (Metro) Red Line Hollywood/Vine Station, which extends to Union Station and connects Downtown Los Angeles to North Hollywood. The Project is also within a quarter mile of Metro bus routes including the Metro Local Lines 180, 210, 212/312, 217, and 222, Metro Rapid Line 780, which serves Hollywood Boulevard and Vine Street, and LADOT DASH lines (Hollywood, Beachwood Canyon, and Hollywood/Wilshire). In addition, the Project would implement a Transportation Demand Program (TDM) that would implement a variety of TDM strategies such as: unbundling parking for residents, carpooling incentives for commercial tenants, and shuttle services for hotels. Implementation of the TDM strategies would reduce Project-related trips and VMT consistent with research cited by the California Air Pollution Control Officers Association (CAPCOA) in its guidance document Quantifying Greenhouse Gas Mitigation Measures.[38] Refer to additional information regarding the Project's TDM strategies and other VMT-reducing characteristics in Section IV.E, *Greenhouse Gas Emissions*, and Section IV.L, *Transportation*, of this Draft EIR as well

37 City of Los Angeles Department of City Planning, Zoning Information File ZI NO. 2451 Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA.

38 California Air Pollution Control Officers Association (CAPCOA), Quantifying Greenhouse Gas Mitigation Measures, 2010.

as the Project's Transportation Assessment study provided in Appendix N-1 of this Draft EIR.[39]

d) Analysis of Project Impacts

Threshold (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?

Construction of the Project with the East Site Hotel Option would require similar construction activities as the Project although at slightly reduced scale. The construction emissions calculated in the analysis below reflect the Project to provide a conservative assessment of Project construction emissions, and have been applied to the Project with the East Site Hotel Option. During operation, the Project and the Project with the East Site Hotel Option would result in slightly different energy demands due to the difference in land uses. Thus, energy calculations are provided for both Project options, as necessary. However, despite the variance in the quantified energy demands, the Project's energy consumption would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

(1) Impact Analysis

(a) The Project's Energy Requirements and its Energy Use Efficiencies by Amount and Fuel Type for Each Stage of the Project Including Construction, Operation, Maintenance, and/or Removal. If Appropriate, the Energy Intensiveness of Materials may be Discussed.

(i) Construction

During Project construction, energy would be consumed in the form of electricity on a limited basis for powering lights, electronic equipment, or other construction activities necessitating electrical power. Project construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities).

Table IV.O-1, *Summary of Energy Use During Project Construction*, provides a summary of the annual average electricity, gasoline fuel, and diesel fuel estimated to be consumed during Project construction, for both the overlapping and sequential construction

39 Fehr & Peers, Transportation Assessment for the Hollywood Center Project, March 2020. Provided in Appendix N-1 of this Draft EIR.

scenarios. As discussed previously, energy consumption during construction would generally be similar for both the Project and the Project with the East Site Hotel Option.

TABLE IV.O-1
SUMMARY OF ENERGY USE DURING PROJECT CONSTRUCTION [a]

Energy Type	Total Quantity [b]	Annual Average Quantity During Construction [b]	
		Overlapping Construction Scenario	Sequential Construction Scenario
Electricity			
Electricity from Water (Dust Control)	183,968 kWh	41,195 kWh	28,084 kWh
Total Electricity	**183,968 kWh**	**41,195 kWh**	**28,084 kWh**
Gasoline			
On-Road Construction Equipment	523,816 gal	117,296 gal	79,964 gal
Off-Road Construction Equipment	0 gal	0 gal	0 gal
Total Gasoline	**523,816 gal**	**117,296 gal**	**79,964 gal**
Diesel			
On-Road Construction Equipment	468,312 gal	104,868 gal	71,491 gal
Off-Road Construction Equipment	457,759 gal	102,504 gal	69,880 gal
Total Diesel	**926,071 gal**	**207,372 gal**	**141,370 gal**

kWh = kilowatt-hours; gal = gallons

[a] Detailed assumptions and calculations are provided in Appendix Q of this Draft EIR.

[b] Totals may not add up due to rounding of decimals.

SOURCE: ESA, 2020.

(a) Electricity

During construction of the Project, electricity would be consumed, on a limited basis, to power lighting and supply and convey water for dust control. Electricity would be supplied to the Project Site by LADWP and would be obtained from the existing electrical lines that connect to the Project Site.

As shown in Table IV.O-1, annual average construction electricity usage for the Project would be approximately 41,195 kWh under the overlapping construction scenario and 28,094 kWh under the sequential construction scenario. Under the overlapping construction scenario, which presents the maximum Project condition, the annual average construction electricity usage represents approximately 0.3 percent of the Project annual operational electricity consumption, and 0.4 percent of the annual operational

electricity consumption under the Project with the East Site Hotel Option.[40] As discussed below, operational electrical consumption for both the Project and the Project with the East Site Hotel Option would be within the supply and infrastructure capabilities of LADWP (forecasted to be 23,537 GWh in total energy sales in the 2025-2026 fiscal year and 24,078 GWh in total energy sales in the 2027-2028 fiscal year).[41,42] Therefore, construction electrical consumption would be within the supply and infrastructure capabilities of LADWP.

The electricity demand at any given time would vary throughout the duration of construction based on the types of activities being performed, and would cease upon completion of construction. Electricity use from construction would be short-term, the majority of which would be limited to working hours, used for necessary construction-related activities, and represent a small fraction of the Project's annual operational electricity. **Therefore, impacts from the Project's or the Project with East Site Hotel Option's electrical demand during construction would be less than significant and would not result in the wasteful, inefficient, and unnecessary consumption of energy.**

(b) Natural Gas

As stated above, construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not generally be expected to be used for Project construction activities; thus, there would be no expected demand generated by construction of the Project. If natural gas is used during construction, it would be in limited amounts and on a temporary basis and would specifically be used to replace or offset diesel-fueled equipment and as such would not result in substantial on-going demand. **Therefore, impacts from construction natural gas demand from the Project or the Project with East Site Hotel Option would be less than significant and would not result in the wasteful, inefficient, and unnecessary consumption of energy.**

(c) Transportation Energy

Table IV.O-1 reports the estimated amount of petroleum-based transportation energy that is expected to be consumed during Project construction. Energy calculations are provided in Appendix Q of this Draft EIR. Project construction would occur for approximately 4.5 years under the overlapping construction scenario and over an approximately seven-year period under the sequential construction scenario. On- and off-road vehicles would consume an estimated annual average of approximately 207,372 gallons of diesel and approximately 117,296 gallons of gasoline under the overlapping construction scenario, and an estimated annual average of approximately 141,370 gallons of diesel and 79,964 gallons of gasoline under the sequential construction scenario. For comparison purposes

40 41,195 kWh (see Table IV.O-1) / 11,768,088 kWh (see Table IV.O-2) = 0.0035; 28,084 kWh (see Table IV.O-1) / 12,252,572 kWh (see Table IV.O-2) = 0.0034.

41 LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.

42 LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, Appendix A, Table A-1.

only, and not for the purpose of determining significance, the annual average fuel usage during the overlapping construction scenario would represent approximately 0.003 percent of the 2018 annual on-road gasoline-related energy consumption and 0.039 percent of the 2018 annual diesel fuel-related energy consumption in Los Angeles County,[43] as shown in Appendix Q of this Draft EIR. Furthermore, the annual average fuel usage during the sequential construction scenario would represent approximately 0.002 percent of the 2017 annual on-road gasoline-related energy consumption and 0.027 percent of the 2018 annual diesel fuel-related energy consumption in Los Angeles County,[44] as shown in Appendix Q of this Draft EIR.

Transportation fuels (gasoline and diesel) are produced from crude oil, which can be domestic or imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet over 50 years of worldwide consumption.[45] Vehicles that would be used by construction workers would comply with Corporate Average Fuel Economy fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). Vehicles that would be used by construction workers would also comply with Pavley and Low Carbon Fuel Standards which are designed to reduce vehicle GHG emissions, but would also result in fuel savings in addition to compliance with Corporate Average Fuel Economy standards.[46]

Construction of the Project would utilize fuel-efficient equipment consistent with State and federal regulations, such as fuel efficiency regulations in accordance with the CARB Pavley Phase II standards, the anti-idling regulation in accordance with Section 2485 in Title 13 of the California Code of Regulations, and fuel requirements in accordance with Section 93115 in Title 17 of the California Code of Regulations, and would comply with State measures to reduce the inefficient, wasteful, and unnecessary consumption of energy, such as petroleum-based transportation fuels. While these regulations are intended to reduce construction emissions, compliance with the anti-idling and emissions regulations discussed above would also result in fuel savings from the use of more fuel-efficient engines. In addition, the Project would divert mixed construction and demolition debris to City-certified construction and demolition waste processors using City-certified waste haulers, consistent with the Los Angeles City Council approved Ordinance No. 181,519 (LAMC Chapter VI, Article 6, Section 66.32-66.32.5 (Purpose; Solid Waste Hauler Permit Requirements; AB 939 Compliance Fees; Violations, Penalties, and Permit Suspension and Revocation; Compliance Permit Terms and Conditions; Indemnifications, respectively) and consistent with achieving the United States Green

43 CEC, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2020.

44 CEC, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2020.

45 BP Global, Oil reserves, 2018, http://www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil/oil-reserves.html, accessed January 7, 2019.

46 As mentioned under Subsection IV.O.2.a)(2)(d), *California Assembly Bill 1493 (AB 1493, Pavley)*, In September 2019, the USEPA published the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule in the federal register (Federal Register, Vol. 84, No. 188, Friday, September 27, 2019, Rules and Regulations, 51310-51363) that maintains the vehicle miles per gallon standards applicable in model year 2020 for model years 2021 through 2026. California and 23 other states and environmental groups in November 2019 in U.S. District Court in Washington, filed a petition for the EPA to reconsider the published rule. The Court has not yet ruled on these lawsuits.

Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Gold Certification level or its equivalent as discussed in Project Design Feature GHG-PDF-1 (Green Building Features). Diversion of mixed construction and demolition debris would reduce truck trips to landfills, which are typically located some distance away from City centers, and increase the amount of waste recovered (e.g., recycled, reused, etc.) at material recovery facilities, thereby further reducing transportation fuel consumption.

Based on the analysis above, construction would utilize energy only for necessary on-site activities and to transport construction materials, excavated fill, and demolition debris to and from the Project Site. As discussed above, idling restrictions and the use of cleaner, energy-efficient equipment would result in less fuel combustion and energy consumption and thus reduce the Project's construction-related energy use. **Therefore, construction of the Project or the Project with the East Site Hotel Option would not result in the wasteful, inefficient, and unnecessary consumption of energy.**

(ii) Operation

During operation of the Project and the Project with the East Site Hotel Option, energy would be consumed for multiple purposes, including, but not limited to, heating/ventilating/air conditioning (HVAC); refrigeration; lighting; and the use of electronics, equipment, and appliances. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. **Table IV.O-2**, *Summary of Annual Operation Energy Use by the Project and the Project with the East Site Hotel Option*, provides a summary of the Project and the Project with the East Site Hotel Option operational energy and transportation fuel demand as follows:

- The Project's operational West Site energy demand would be approximately 6,128,997 kWh of electricity per year, 7,871,569 kBtu of natural gas per year, 144,615 gallons of gasoline per year, and 19,316 gallons of diesel fuel per year in anticipated buildout year 2024.
- Under the overlapping construction scenario, the Project would be built out in year 2025. The Project energy demand at full build out of both the West and East Sites would be approximately 11,768,088 kWh of electricity per year, 16,535,490 kBtu of natural gas per year, 299,065 gallons of gasoline per year, and 40,980 gallons of diesel fuel per year in 2025. Under the Project with the East Site Hotel Option, the operational energy demand would be approximately 12,252,572 kWh of electricity per year, 18,448,420 kBtu of natural gas per year, 353,204 gallons of gasoline per year, and 49,989 gallons of diesel fuel per year in 2025.

TABLE IV.O-2
SUMMARY OF ANNUAL OPERATION ENERGY USE BY THE PROJECT AND THE PROJECT WITH THE EAST SITE HOTEL OPTION [a,b]

Energy Type	Project – West Site Buildout (Year 2024)	Project Built under the Overlapping Construction Scenario		Project Built under the Sequential Construction Scenario	
		Project Buildout (Year 2025)	Project with the East Site Hotel Option Buildout (Year 2025)	Project Buildout (Year 2027)	Project With the East Site Hotel Option Buildout (Year 2027)
Electricity[c]					
Project	6,128,997 kWh	11,768,088 kWh	12,252,572 kWh	11,768,088 kWh	12,252,572 kWh
Natural Gas[c]					
Project	7,871,569 kBtu	16,535,490 kBtu	18,448,420 kBtu	16,535,490 kBtu	18,448,420 kBtu
Transportation[d]					
Project					
Gasoline	144,615 gal	299,065 gal	353,204 gal	281,617 gal	332,597 gal
Diesel	19,316 gal	40,980 gal	46,989 gal	41,042 gal	47,062 gal
Total Transportation Fuel	**163,931 gal**	**340,045 gal**	**400,193 gal**	**322,659 gal**	**379,659 gal**

kWh = kilowatt-hours; kBtu = thousand British thermal unit; gal = gallons

[a] Detailed calculations are provided in Appendix Q of this Draft EIR.

[b] Totals may not add up due to rounding of decimals.

[c] The Project and the Project with the East Site Hotel Option energy calculations assume implementation of Project Design Feature GHG-PDF-1 in Section IV.E, *Greenhouse Gas Emissions*, and Project Design Feature WS-PDF-1 in Section IV.N.2, *Water Supply*, of this Draft EIR. The building energy optimization credit in Project Design Feature GHG-PDF-1 represents a larger reduction than compliance with the 2019 Title 24 Standards, where electricity would be reduced by approximately 2% and natural gas would be reduced by approximately 5% as compared to 2016 Title 24 Standards. Therefore, the Project would be consistent with and better than the 2019 Title 24 Standards through the implementation of Project Design Feature GHG-PDF-1. Refer to: California Energy Commission, Impact Analysis, 2019 Update to the California Energy Efficiency Standards for Residential and Non-Residential Buildings, Section 1.2 (Non-Residential), Table 19 (Multi-Family without PV), June 10, 2015.

[d] Transportation fuel varies with year, based on the vehicle fleet makeup and fuel efficiency factors in the EMFAC model. For example, for a given VMT estimate, the overall long-term trend for gasoline consumption would generally be expected to decline in future years as the overall vehicle fleet (primarily passenger vehicles) becomes more fuel efficient.

SOURCE: ESA, 2020.

- Under the sequential construction scenario, the Project would be built out in year 2027. Under the Project's full buildout of the Proposed Development Program, the operational energy demand would be approximately 11,768,088 kWh of electricity per year, 16,535,490 kBtu of natural gas per year, 281,617 gallons of gasoline per year,

and 41,042 gallons of diesel fuel per year in 2027. Under full buildout of the Project with the East Site Hotel Option, the operational energy demand would be approximately 12,252,572 kWh of electricity per year, 18,448,420 kBtu of natural gas per year, 332,597 gallons of gasoline per year, and 47,062 gallons of diesel fuel per year in 2027.

Additional information and analysis regarding the Project and the Project with the East Site Hotel Option operational energy and transportation fuel demand is provided below in the following subsections.

(a) Electricity

With compliance with Title 24 standards and applicable CALGreen requirements, the Project's West Site would result in a projected increase in the on-site annual demand for electricity totaling approximately 6,128,997 kWh of electricity, as shown in Table IV.O-2. Full buildout of the Project would result in a projected increase in the on-site demand for electricity of approximately 11,768,088 kWh of electricity per year. Full buildout of the Project with the East Site Hotel Option would result in a higher projected increase in the on-site demand for electricity, at approximately 12,252,572 kWh of electricity per year.

In addition to compliance with the CALGreen Code, the Project also incorporates Project Design Feature GHG-PDF-1 (Green Building Features) as described in Section IV.E, *Greenhouse Gas Emissions*, of this Draft EIR, which includes building features to achieve the USGBC LEED Gold Certification level or its equivalent, to reduce indoor water use by 40 percent and outdoor water use by 100 percent from the LEED usage baseline. In addition, the Project incorporates Project Design Feature WS-PDF-1 (Water Conservation Features) as provided in Section IV.N.2, *Water Supply*, of this Draft EIR, to minimize water demand and associated energy needed for water conveyance. As shown therein, Project Design Feature WS-PDF-1 includes the installation of low-flow and high efficiency clothes washers and dishwashers; low-flow and high efficiency toilets and urinals; landscaping consisting of drought-tolerant plants and other low water use landscaping; water efficient drip/subsurface irrigation and overhead-spray, pool splash troughs to capture pool water and reuse of pool backwash water for irrigation, and other water saving features.

LADWP is required to procure at least 33 percent of its energy portfolio from renewable sources by 2020. With the passage of SB 100 in September 2018, LADWP will be required to update its long-term plans to demonstrate compliance including providing 60 percent of its energy portfolio from renewable sources by December 31, 2030, and ultimately planning for 100 percent eligible renewable energy resources and zero-carbon resources by December 31, 2045. LADWP's current sources include wind, solar, and geothermal sources. These sources accounted for 30 percent of LADWP's overall energy mix in 2017, the most recent year for which data are available.[47] LADWP generates its load forecast based on multiple forms of data from various agencies, including historical

47 CEC, Utility Annual Power Content Labels for 2017, July 2018.

sales from the General Accountings Consumption and Earnings report, historical Los Angeles County employment data provided from the State's Economic Development Division, plug-in electric vehicle (PEV) projections from the CEC account building permits when determining electricity Load Forecasts, solar rooftop installations from the Solar Energy Development Group, electricity price projections from the Financial Services organization, and LADWP program efficiency forecasts.[48] In addition, LADWP considers projected Los Angeles County building permit amounts calculated by the UCLA Anderson School of Management when determining its load forecast and would therefore account for the Project's electricity demand.[49]

Based on LADWP's collected data in its 2017 Power Strategic Long-Term Resource Plan, LADWP forecasts that its total energy sales in the 2024-2025, 2025-2026, and 2027-2028 fiscal years (the Project's West Site buildout year, the Project, and the Project with the East Site Hotel Option full buildout years) would be 23,286 GWh, 23,537 GWh and 24,078 GWh of electricity, respectively.[50,51] As such, the Project-related increase in annual electricity consumption of 6,128,997 kWh per year in 2024 from buildout of the Project's West Site would represent approximately 0.026 percent of LADWP's projected sales in 2024 and, therefore, would be within LADWP's projected electricity supplies.

Full buildout of the Project would result in an increase in annual electricity consumption of approximately 11,768,088 kWh per year. Full buildout of the Project with the East Site Hotel Option would result in an increase in annual electricity consumption of approximately 12,252,572 kWh per year. Should the Project be built under the overlapping construction schedule and become operational in 2025, the Project and the Project with the East Site Hotel Option would represent approximately 0.050 percent and 0.052 percent of LADWP's projected sales in 2025, respectively, and, therefore, would both be within LADWP's projected electricity supplies. Should the Project and the Project with the East Site Hotel Option be built under the sequential construction schedule and become operational in 2027, they would represent approximately 0.049 percent and 0.051 percent of LADWP's projected sales in 2027, respectively, and, therefore, would both be within LADWP's projected electricity supplies.

Furthermore, LADWP has stated that "electric service is available and will be provided in accordance with the LADWP's Rules Governing Water and Electric Service" and that "the estimated power requirement for this proposed project is part of the total load growth of the City's power system."[52] As previously described, the Project incorporates a variety of energy and water conservation measures and features to reduce energy usage and minimize energy demand. **Therefore, operation of the Project or the Project with the**

48 LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, page 70.
49 LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, page 67.
50 LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.
51 LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, page 14.
52 LADWP, 1720-1770 N Vine St; 1746-1760 N Ivar Ave; 1733 & 1741 Argyle Ave; 6236, 6270, 6334 W Yucca St, Los Angeles, California 90028, Letter from Ralph Jaramillo to KPFF, dated October 1, 2018. Provided as Exhibit 5 of Appendix P-1, KPFF's Utility Technical Report, of this Draft EIR.

East Site Hotel Option would not result in the wasteful, inefficient, or unnecessary consumption of electricity.

(b) Natural Gas

With compliance with Title 24 standards and applicable CALGreen Code requirements, the Project's West Site is projected to generate an increase in the on-site annual demand for natural gas totaling approximately 7,871,569 kBtu, as shown in Table IV.O-2. Full buildout of the Project would result in a projected increase in the on-site annual demand for natural gas totaling approximately 16,535,490 kBtu. Full buildout of the Project with the East Site Hotel Option would result in a projected increase in the on-site annual demand for natural gas totaling approximately 18,448,420 kBtu. As discussed above, in addition to complying with applicable regulatory requirements regarding energy conservation (e.g., California Building Energy Efficiency Standards and the CALGreen Code), the Project incorporates project design features to further reduce energy use. The Project incorporates Project Design Feature GHG-PDF-1 (Green Building Features), as described in Section IV.E, *Greenhouse Gas Emissions*, of this Draft EIR, which includes building features to achieve the USGBC LEED Gold Certification level or its equivalent.

Based on the 2018 California Gas Report, the California Energy and Electric Utilities, a collective of California utility companies, estimates natural gas supplies within SoCalGas' planning area will be approximately 923,282 million kBtu in 2024, 914,971 million kBtu in 2025 and 897,971 million kBtu in 2027.[53]

The Project's West Site would account for approximately 0.0009 percent of the 2024 forecasted annual supplies in SoCalGas' planning area and therefore would fall within SoCalGas' projected supplies for the area in 2024.[54] The Project at full buildout would account for approximately 0.0018 percent of the 2025 forecasted annual supplies in SoCalGas' planning area, and approximately 0.0020 percent of the 2025 forecasted annual supplies in SoCalGas' planning area under the Project with the East Site Hotel Option. The Project and the Project with the East Site Hotel Option would fall within SoCalGas' projected supplies for the area in 2025.[55] The Project would account for approximately 0.0018 percent of the 2027 forecasted annual supplies in SoCalGas' planning area and approximately 0.0021 percent of the 2027 forecasted annual supplies in SoCalGas' planning area under the Project with the East Site Hotel Option. Both would fall within SoCalGas' projected supplies for the area in 2027.

Furthermore, SoCalGas has stated that it has "facilities in the area" of the Project Site and that "service would be in accordance with SoCalGas' policies and extension rules on file with the California Public Utilities Commission (Commission) at the time contractual

53 California Gas and Electric Utilities, 2018 California Gas Report, 2018, page 103.
54 California Gas and Electric Utilities, 2018 California Gas Report, 2018, page 103.
55 California Gas and Electric Utilities, 2018 California Gas Report, 2018, page 103.

arrangements are made."[56] As previously described, the Project incorporates a variety of energy conservation measures and features to reduce energy usage and minimize energy demand. **Therefore, operation of the Project or the Project with the East Site Hotel Option would not result in the wasteful, inefficient, or unnecessary consumption of natural gas.**

(c) Transportation Energy

During operation, Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. The Project Site is an infill location and is conveniently located to nearby shopping areas with grocery stores, restaurants, and retail/commercial land uses, and the Project Site itself is located close to multiple transit options, affording all of the proposed uses broad mobility without the need to use passenger vehicles. A majority of the vehicle fleet that would be used by future residents, visitors, and workers would consist of light-duty automobiles and light-duty trucks, which are subject to fuel efficiency standards.[57] Annual trips for the Project were estimated using trip rates provided in the Transportation Assessment study included in Appendix N-1 of this Draft EIR.[58]

As shown in Table IV.O-2, the Project's West Site is estimated to result in an annual increase in petroleum-based fuel usage of approximately 144,615 gallons of gasoline and 19,316 gallons of diesel, or an annual total of 163,931 gallons of petroleum-based fuels.

In 2025, full buildout of the Project is estimated to result in an annual increase in petroleum-based fuel usage of approximately 299,065 gallons of gasoline and 40,980 gallons of diesel, or an annual total of 340,045 gallons of petroleum-based fuels. Full buildout of the Project with the East Site Hotel Option is estimated to result in an annual increase in petroleum-based fuel usage of approximately 353,204 gallons of gasoline and 46,989 gallons of diesel, or an annual total of 400,193 gallons of petroleum-based fuels.

If full buildout of the Project or the Project with the East Site Hotel Option is completed in 2027, transportation-related energy consumption is expected to be slightly less than in 2025 because the vehicles used by future residents, visitors, and workers would be more fuel efficient pursuant to State regulations that require newer model year vehicles to meet more stringent fuel efficiency standards. In 2027, full buildout of the Project is estimated to result in an annual increase in petroleum-based fuel usage of approximately 281,617 gallons of gasoline and 41,042 gallons of diesel, or an annual total of 322,659 gallons of

56 Southern California Gas Company, Will Service Letter Request for – Job ID# 43-2018-08-00068: 5546-030-034; 5546-030-028; 5546-030-032; 5546-030-031; 5546-030-033, Letter from Pedro Reyes to KPFF, dated October 8, 2018. Provided as Exhibit 6 of Appendix P-1, KPFF's Utility Technical Report, of this Draft EIR.

57 Transportation fuel varies with year, based on the vehicle fleet makeup and fuel efficiency factors in the EMFAC model. For example, for a given VMT estimate, the overall long-term trend for gasoline consumption would generally be expected to decline in future years as the overall vehicle fleet (primarily passenger vehicles) becomes more fuel efficient.

58 Fehr & Peers, Transportation Assessment for the Hollywood Center Project, March 2020. Provided in Appendix N-1 of this Draft EIR.

petroleum-based fuels. Full buildout of the Project with the East Site Hotel Option is estimated to result in an annual increase in petroleum-based fuel usage of approximately 332,597 gallons of gasoline and 47,062 gallons of diesel, or an annual total of 379,659 gallons of petroleum-based fuels.

Based on the CEC's California Annual Retail Fuel Outlet Report, Los Angeles County consumed approximately 3,638,000,000 gallons of gasoline and 527,083,333 gallons of diesel fuel in 2018.[59] In 2024, the Project's West Site would account for 0.0040 percent of County gasoline consumption and 0.0037 percent of County diesel consumption (based on the available County fuel sales data for the year 2017). In 2025, operation of the Project would account for 0.0082 percent of County gasoline consumption and 0.0078 percent of County diesel consumption, while the Project with the East Site Hotel Option would account for 0.0097 percent of County gasoline consumption and 0.0089 percent of County diesel consumption. In 2027, the Project would account for 0.0077 percent of County gasoline consumption and 0.0078 percent of County diesel consumption, while the Project with the East Site Hotel Option would account for 0.0091 percent of County gasoline consumption and 0.0089 percent of County diesel consumption.

Transportation fuels (gasoline and diesel) are produced from crude oil, which can be domestic or imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet over 50 years of worldwide consumption.[60] Vehicles used by future residents, visitors, and workers would comply with Corporate Average Fuel Economy fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). Vehicles used by future residents, visitors, and workers would also comply with Pavley and Low Carbon Fuel Standards which are designed to reduce vehicle GHG emissions, but would also result in fuel savings in addition to compliance with Corporate Average Fuel Economy standards.[61]

The Project and the Project with the East Site Hotel Option would support statewide efforts to improve transportation energy efficiency and reduce transportation energy consumption with respect to private automobiles for the reasons provided below. As discussed in Section IV.B, *Air Quality*, and Section IV.E, *Greenhouse Gas Emissions*, of this Draft EIR, the Project represents an infill development within an existing urbanized area that would concentrate new residential and neighborhood-serving commercial retail and restaurant uses within a TPA, which is defined by the City as an area within one-half

59 CEC, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2020.

60 BP Global, Oil reserves, 2018, http://www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil/oil-reserves.html, accessed January 7, 2019.

61 As mentioned under Subsection IV.O.2.a)(2)(d), *California Assembly Bill 1493 (AB 1493, Pavley)*, In September 2019, the USEPA published the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule in the federal register (Federal Register, Vol. 84, No. 188, Friday, September 27, 2019, Rules and Regulations, 51310-51363) that maintains the vehicle miles per gallon standards applicable in model year 2020 for model years 2021 through 2026. California and 23 other states and environmental groups in November 2019 in U.S. District Court in Washington, filed a petition for the EPA to reconsider the published rule. The Court has not yet ruled on these lawsuits.

mile of a major transit stop that is existing or planned,[62] and within an HQTA, which is defined by the 2016-2040 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. The Project Site location would result in reduced vehicle trips and VMT compared to a standard project of similar size and land uses without close access to off-site destinations and public transit stops. The Project Site is located within a quarter-mile of public transportation, including the Metro Red Line Hollywood/Vine Station, which extends to Union Station and connects Downtown Los Angeles to North Hollywood. The Project Site is also within a quarter mile of many Metro bus routes including the Metro Local Lines 180, 210, 212/312, 217, and 222, Metro Rapid Line 780, which serves Hollywood Boulevard and Vine Street, and LADOT DASH lines (Hollywood, Beachwood Canyon, and Hollywood/Wilshire).

In addition, the Project and the Project with the East Site Hotel Option would implement a variety of TDM strategies such as: unbundling parking for residents, carpooling incentives for commercial tenants, and shuttle services for hotels. Implementation of just the TDM strategies would reduce vehicle trips and overall VMT by approximately 20 percent under the Project and approximately 19 percent under the Project with the East Site Hotel Option compared to a standard project of similar size and land uses without close access to off-site destinations and public transit stops (refer to the detailed VMT analysis provided in Section IV.E, *Greenhouse Gas Emissions*, and Section IV.L, *Transportation*, of this Draft EIR).[63]

As the above discussion demonstrates, the Project would minimize operational transportation fuel demand consistent with and not in conflict with State, regional, and City goals. **Therefore, operation of the Project or the Project with the East Site Hotel Option would not result in the wasteful, inefficient, and unnecessary consumption of energy.**

(b) The Effects of the Project on Local and Regional Energy Supplies and on Requirements for Additional Capacity.

(i) Construction

As discussed above, electricity would be consumed during Project construction activities. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed, and would cease upon completion of construction. Electricity would be supplied to the Project Site by LADWP and would be obtained from the existing electrical lines that connect to the Project Site. Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus, there would be no demand generated by

62 City of Los Angeles, Department of City Planning, Zoning Information File ZI NO. 2451 Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA.

63 Fehr & Peers, Transportation Assessment for the Hollywood Center Project, March 2020. Provided in Appendix N-1 of this Draft EIR.

construction. As stated above, transportation fuel usage during Project construction activities would represent approximately 0.003 percent of gasoline usage and 0.039 percent of diesel usage within Los Angeles County under the overlapping construction scenario, and approximately 0.002 percent of gasoline usage and 0.027 percent of diesel usage within Los Angeles County under the overlapping construction scenario, respectively. Construction transportation energy would be provided by existing retail service stations and from existing mobile fuel services that are typically needed to deliver fuel to a construction site to refuel the off-road construction equipment at the Project Site and no new facilities would be expected to be required. **As energy consumption during construction would not be substantial (compared to existing and projected Countywide consumption) and as energy supplies of the existing purveyors are sufficient to serve the project in addition to existing commitment, the Project or the Project with the East Site Hotel Option would not affect the local and/or regional energy supplies and would not require additional capacity.**

(ii) Operation

As stated above, based on LADWP's 2017 Power Strategic Long-Term Resource Plan, LADWP forecasts that its total energy sales in the 2024-2025, 2025-2026, and 2027-2028 fiscal years (the Project's West Site buildout year and the Project and Project with the East Site Hotel Option full buildout years) would be 23,286 GWh, 23,537 GWh and 24,078 GWh of electricity, respectively.[64,65] The increase in annual operational electricity consumption of 6,128,997 kWh per year in 2024 from buildout of the Project's West Site would represent approximately 0.026 percent of LADWP's projected sales in 2024 and therefore would be within LADWP's projected electricity supplies. In addition, the increase in annual operational electricity consumption in 2025 of 11,768,088 kWh per year from full buildout of the Project, or 12,252,572 kWh per year under the Project with the East Site Hotel Option, would represent approximately 0.050 percent and 0.052 percent of LADWP's projected sales in 2025, respectively, and, therefore, would both be within LADWP's projected electricity supplies. Furthermore, the increase in annual operational electricity consumption in 2027 of 11,768,088 kWh per year from full buildout of the Project, or 12,252,572 kWh per year under the Project with the East Site Hotel Option, would represent approximately 0.049 percent and 0.051 percent of LADWP's projected sales in 2027, respectively, and, therefore, would both be within LADWP's projected electricity supplies. LADWP has stated that "electric service is available and will be provided in accordance with the Los Angeles Department of Water and Power's Rules Governing Water and Electric Service" and that "the estimated power requirement for this proposed project is part of the total load growth of the City's power system."[66] Based on these factors, it is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to serve the Project's electricity demand.

64 LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.
65 LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, Appendix A, Table A-1.
66 LADWP, 1720-1770 N Vine St; 1746-1760 N Ivar Ave; 1733 & 1741 Argyle Ave; 6236, 6270, 6334 W Yucca St, Los Angeles, California 90028, Letter from Ralph Jaramillo to KPFF, dated October 1, 2018.

As stated above, the Project's estimated increase in demand for natural gas from the Project's West Site is 7,871,569 kBtu per year in 2024. Full buildout of the Project would result in a projected increase in the on-site demand for natural gas totaling approximately 16,535,490 kBtu per year, and full buildout of the Project with the East Site Hotel Option would result in a projected increase in the on-site demand for natural gas totaling approximately 18,448,420 kBtu per year. Based on the 2018 California Gas Report, the California Energy and Electric Utilities estimates that natural gas supplies within SoCalGas' planning area will be approximately 923,282 million kBtu in 2024, 914,971 million kBtu in 2025 and 897,971 million kBtu in 2027.[67] This report predicts gas demand for all sectors (residential, commercial, industrial, energy generation and wholesale exports) and presents best estimates, as well as scenarios for hot and cold years. The Project's West Site would, therefore, account for approximately 0.0009 percent of the 2024 forecasted annual supplies in SoCalGas' planning area and, therefore, would fall within SoCalGas' projected supplies for the area in 2024.[68] In 2025, the Project would account for approximately 0.0018 percent of the 2025 forecasted annual supplies in SoCalGas' planning area and the Project with the East Hotel Option would account for approximately 0.0020 percent of the 2025 forecasted annual supplies in SoCalGas' planning area, and, therefore, both would fall within SoCalGas' projected supplies for the area in 2025.[69] In 2027, the Project would account for approximately 0.0018 percent of the 2027 forecasted annual supplies in SoCalGas' planning area the Project with the East Site Hotel Option would account for approximately 0.0021 percent of the 2027 forecasted annual supplies in SoCalGas' planning area, and, therefore, both would fall within SoCalGas' projected supplies for the area in 2027. SoCalGas has stated that it has "facilities in the area" of the Project and that "service would be in accordance with SoCalGas' policies and extension rules on file with the California Public Utilities Commission (Commission) at the time contractual arrangements are made."[70] As such, it is expected that SoCalGas' existing and planned natural gas capacity and supplies will be sufficient to serve the Project's demand.

As stated above, in 2024, the Project's West Site would be estimated to result in an annual increase in petroleum-based fuel usage of approximately 144,615 gallons of gasoline and 19,316 gallons of diesel, or an annual total of 163,931 gallons of petroleum-based fuels. In 2025, full buildout of the Project is estimated to result in an annual increase in petroleum-based fuel usage of approximately 299,065 gallons of gasoline and 40,980 gallons of diesel, or an annual total of 340,045 gallons of petroleum-based fuels. Full buildout of the Project with the East Site Hotel Option is estimated to result in an annual increase in petroleum-based fuel usage of approximately 353,204 gallons of gasoline and 46,989 gallons of diesel, or an annual total of 400,193 gallons of petroleum-based fuels.

67 California Gas and Electric Utilities, 2018 California Gas Report, 2018, page 103.
68 California Gas and Electric Utilities, 2018 California Gas Report, 2018, page 103.
69 California Gas and Electric Utilities, 2018 California Gas Report, 2018, page 103.
70 Southern California Gas Company, Will Service Letter Request for – Job ID# 43-2018-08-00068: 5546-030-034; 5546-030-028; 5546-030-032; 5546-030-031; 5546-030-033, Letter from Pedro Reyes to KPFF, dated October 8, 2018.

In 2027, full buildout of the Project is estimated to result in an annual increase in petroleum-based fuel usage of approximately 281,617 gallons of gasoline and 41,042 gallons of diesel, or an annual total of 322,659 gallons of petroleum-based fuels. Full buildout of the Project with the East Site Hotel Option is estimated to result in an annual increase in petroleum-based fuel usage of approximately 332,597 gallons of gasoline and 47,062 gallons of diesel, or an annual total of 379,659 gallons of petroleum-based fuels.

For comparison purposes, the transportation-related fuel usage for the Project's West Site would account for 0.0040 percent of County gasoline consumption and 0.0037 percent of County diesel consumption (based on the available County fuel sales data for the year 2017). In 2025, the Project would account for 0.0082 percent of County gasoline consumption and 0.0078 percent of County diesel consumption, and the Project with the East Site Hotel Option would account for 0.0097 percent of County gasoline consumption and 0.0089 percent of County diesel consumption. In 2027, the Project would account for 0.0077 percent of County gasoline consumption and 0.0078 percent of County diesel consumption, and the Project with the East Site Hotel Option would account for 0.0091 percent of County gasoline consumption and 0.0089 percent of County diesel consumption. Detailed energy calculations are shown in in Appendix Q of this Draft EIR.

Operational transportation energy would be provided by existing retail service stations and no new retail service stations would be expected to be required. Transportation fuels (gasoline and diesel) are produced from crude oil, which can be produced from domestic supplies or imported from various regions around the world and, based on current proven reserves, crude oil production would be sufficient to meet over 50 years of consumption.[71] As such, it is expected that existing and planned transportation fuel supplies will be sufficient to serve the Project's demand. **As electricity consumption during operation would be serviceable by LADWP and included in LADWP's total load growth of the City's power system, as SoCalGas' existing and planned natural gas capacity and supplies would be sufficient to serve the Project's and the Project with the East Site Hotel Option's operational natural gas demand, and as the Project's and the Project with the East Site Hotel Option's operational transportation energy would be provided by existing retail service stations such that no new retail service stations would be expected to be required, the Project and the Project with the East Site Hotel Option would not affect the local and/or regional energy supplies and would not require additional capacity.**

(c) The Effects of the Project on Peak and Base Period Demands for Electricity and Other Forms of Energy

As discussed above, electricity demand during construction and operation of the Project would have a negligible effect on the overall capacity of the LADWP's power grid and base load conditions. With regard to peak load conditions, the LADWP power system

71 BP Global, Oil reserves, 2018, http://www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil/oil-reserves.html, accessed January 7, 2019.

experienced an all-time high peak of 6,502 MW on August 31, 2017.[72] LADWP also estimates a peak load based on two years of data known as base case peak demand to account for typical peak conditions. Based on LADWP estimates for 2024-2025, 2025-2026 and 2027-2028 (the associated forecasted years for the first operational year for the West Site buildout, for the full Project buildout and the Project with the East Site Hotel Option buildout under the overlapping construction scenario, and for the full Project buildout and the Project with the East Site Hotel Option buildout under the sequential construction scenario, respectively), the base case peak demand for the power grid is 6,029 MW, 6,076 MW, and 6,182 MW respectively.[73]

Based on the Project's Utility Technical Report, although not expected to happen under real-world conditions, under peak conditions, the Project's West Site (with a buildout of 2024) would be designed with an electricity infrastructure that could accommodate a maximum instantaneous peak demand of 12,366 kW.[74,75] In comparison to the LADWP power grid base peak load of 6,029 MW for 2024-2025, based on the assumption above, the Project's West Site would represent approximately 0.21 percent of the LADWP base peak load conditions.[76]

Based on the Project's Utility Infrastructure Technical Report, although not expected to happen under real-world conditions, full buildout of the Project would be designed with an electricity infrastructure that could accommodate a maximum instantaneous peak demand of 24,016 kW. The Project with the East Site Hotel Option would be designed with an electricity infrastructure that could accommodate a maximum instantaneous peak demand of 25,539 kW.[77,78] In comparison to the LADWP power grid base peak load of 6,076 MW for 2025-2026, based on the assumption above, the Project would represent approximately 0.40 percent of the LADWP base peak load conditions, and the Project with the East Site Hotel Option would represent approximately 0.42 percent of the LADWP base peak load conditions.[79] In comparison to the LADWP power grid base peak load of 6,182 MW for 2027-2028, based on the assumption above, the Project would represent approximately 0.39 percent of the LADWP base peak load conditions, and the Project with the East Site Hotel Option would represent approximately 0.41 percent of the LADWP base peak load conditions.[80] The peak values listed above represent maximum building design capacity loads; thus, the Project and the Project with the East Site Hotel Option would not be expected to generate maximum instantaneous peaks at these levels

72 LADWP, 2017 Retail Electric Sales and Demand Forecast, September 2017, page 6.
73 LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, Appendix A, Table A-1.
74 KPFF Consulting Engineers, Utility Technical Report, January 3, 2019, page 1. Provided in Appendix P-1 of this Draft EIR.
75 For electrical power, 1 kilo-volt ampere is equal to 1 kilowatt
76 Calculated as follows: 12,366 kW / 6,029,000 kW = 0.21%.
77 KPFF Consulting Engineers, Utility Technical Report, January 3, 2019, page 1. Provided in Appendix P-1 of this Draft EIR.
78 For electrical power, 1 kilo-volt ampere is equal to 1 kilowatt
79 Calculated as follows: 24,016 kW / 6,076,000 kW = 0.40% and 25,359 kW / 6,076,000 kW = 0.42%.
80 Calculated as follows: 24,016 kW / 6,182,000 kW = 0.39% and 25,359 kW / 6,182,000 kW = 0.41%.

– actual peak demands would be less than that the values listed above. LADWP has stated that "electric service is available and will be provided in accordance with the Los Angeles Department of Water and Power's Rules Governing Water and Electric Service" and that "the estimated power requirement for this proposed project is part of the total load growth of the City's power system."[81] Therefore, Project and the Project with the East Site Hotel Option electricity consumption during operational activities would have a negligible effect on peak load conditions of the power grid. **Therefore, the Project's and the Project with the East Site Hotel Option's electrical consumption during operational activities would have a negligible effect on peak load conditions of the power grid.**

(d) The Effects of the Project on Energy Resources

As discussed above, LADWP's electricity generation is derived from a mix of non-renewable and renewable sources, such as coal, natural gas, solar, geothermal wind, and hydropower. The LADWP 2017 Power Strategic Long-Term Resource Plan identifies adequate resources (natural gas, coal) to support future generation capacity, and, as discussed above, LADWP's existing and planned electricity capacity and supplies would be sufficient to serve the Project's electricity demand.[82] As discussed above in the Regulatory Framework, one of the objectives of SB 350 was to increase the procurement of California's electricity from renewable sources from 33 percent to 50 percent by 2030. Accordingly, LADWP is required to procure at least 50 percent of its energy portfolio from renewable sources by 2030. The current sources of LADWP's renewable energy include wind, solar, and geothermal sources. These sources account for 30 percent of LADWP's overall energy mix in 2017, which is the most recent year for which data are available.[83] LADWP has committed to providing an increasing percentage of its energy portfolio from renewable sources so as to exceed the RPS requirements. Prior to the passage of SB 100 in September 2018, LADWP committed to exceeding the then-current renewable energy standards by increasing to 50 percent by 2025, 55 percent by 2030, and 65 percent by 2036.[84] With the passage of SB 100, LADWP will be required to update its long-term plans to demonstrate compliance with the update requirements including providing 60 percent of its energy portfolio from renewable sources by December 31, 2030 and ultimately planning for 100 percent eligible renewable energy resources and zero-carbon resources by December 31, 2045. The Project and the Project with the East Site Hotel Option would not conflict with LADWP's ability to procure the required amount of renewable energy.

81 LADWP, 1720-1770 N Vine St; 1746-1760 N Ivar Ave; 1733 & 1741 Argyle Ave; 6236, 6270, 6334 W Yucca St, Los Angeles, California 90028, Letter from Ralph Jaramillo to KPFF, dated October 1, 2018.

82 LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, page ES-25. "The 2017 SLTRP outlines an aggressive strategy for LADWP accomplish its goals, comply with regulatory mandates, and provide sufficient resources over the next 20 years given the information presently available"

83 CEC, Utility Annual Power Content Labels for 2017, July 2018.

84 LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, page ES-3.

With regard to on-site renewable energy sources, the Project and the Project with the East Site Hotel Option would meet the applicable requirements of the Los Angeles Green Building Code and the CALGreen Code, including the creation of building rooftops to be solar-ready to allow the potential for on-site solar photovoltaic or solar water heating systems to be installed in the future. Due to the Project Site's location, other types of renewable energy sources would not be feasible on-site as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, fuel cells, landfill gas, methane, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Additionally, wind-powered energy is not viable on the Project Site due to the lack of sufficient wind in the Los Angeles basin. Specifically, based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential.[85] Therefore, the Project would support renewable energy from solar energy sources in accordance with applicable requirements of the Los Angeles Green Building Code and the CALGreen Code.

As discussed above, natural gas supplied to the Southern California area is mainly sourced from out-of-state with a small portion originating in California. According to the U.S. Energy Information Administration, the United States currently has approximately 90 years of natural gas reserves based on 2016 consumption.[86] Compliance with energy standards is expected to result in more efficient use of natural gas (lower consumption) in future years.[87] Therefore, Project and the Project with the East Site Hotel Option operation activities would have a negligible effect on natural gas supply.

As stated earlier in the discussion under Threshold (a)(1)(i)(c) and Threshold (a)(1)(ii)(c), transportation fuels (gasoline and diesel) are produced from crude oil, which can be provided domestically or imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet over 50 years of worldwide consumption.[88] Therefore, Project and the Project with the East Site Hotel Option construction and operational activities would have a negligible effect on the transportation fuel supply.

Given the evidence presented above, the Project would minimize construction and operational energy and transportation fuel demand to the extent feasible and would not substantially impact energy resources. **Therefore, construction and operation of the Project or the Project with the East Site Hotel Option would not have a significant impact on energy resources.**

85 CEC, Wind Projects and Wind Resource Areas, last updated August 3, 2018, http://www.energy.ca.gov/maps/renewable/wind.html, accessed January 7, 2019.

86 U.S. Energy Information Administration, How much natural gas does the United States have, and how long will it last?, last updated April 5, 2019, https://www.eia.gov/tools/faqs/faq.php?id=58&t=8, accessed January 7, 2019.

87 CEC, Tracking Progress – Energy Efficiency, last updated September 2018.

88 BP Global, Oil reserves, 2018, http://www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil/oil-reserves.html, accessed January 7, 2019.

(e) The Project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

As discussed in Section IV.E, *Greenhouse Gas Emissions*, and Section IV.H*, Land Use and Planning*, of this Draft EIR, the SCAG 2016-2040 RTP/SCS presents the transportation vision for the region through the year 2040 and provides a long-term investment framework for addressing the region's transportation and related challenges. As shown in Exhibit 5.1 of the SCAG 2016-2040 RTP/SCS, the Project Site is located within an HQTA, which SCAG defines as "areas within one-half mile of a fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes or less during peak commuting hours."[89] The 2016-2040 RTP/SCS encourages increasing the density of development with mixed use projects within HQTAs, to reduce VMT and trips.[90]

The Project Site's location within an HQTA would be consistent with and would not conflict with SCAG's land use types for the area and would encourage the use of alternative and efficient modes of transportation, which would result in a reduction in overall VMT (refer to the detailed VMT analysis provided in Section IV.E, *Greenhouse Gas Emissions*, and Section IV.L, *Transportation*, of this Draft EIR). The Project Site is located at an infill location in the highly urbanized and generally built-out active regional center of the Hollywood neighborhood that contains a mix of existing commercial, hotel, studio/production, office, entertainment, and residential uses. The Project Site is located within an identified TPA and is within a quarter mile of multiple public transportation options, including the Metro Red Line Hollywood/Vine Station, which extends to Union Station and connects Downtown Los Angeles to North Hollywood. The Project Site is also within a quarter mile of Metro bus routes, including the Metro Local Lines 180, 210, 212/312, 217, and 222, Metro Rapid Line 780, which serves Hollywood Boulevard and Vine Street, and LADOT DASH lines (Hollywood, Beachwood Canyon, and Hollywood/Wilshire). The Project and the Project with the East Site Hotel Option would also provide parking for bicycles on-site to encourage utilization of alternative mode of transportation. The Project and the Project with the East Site Hotel Option would introduce additional residential density and neighborhood serving uses within close proximity to transit, and the myriad of services and destinations in the area. The Project would implement a variety of TDM strategies that would further reduce Project-related trips and VMT, such as unbundling parking for residents, carpooling incentives for commercial tenants, and shuttle services for hotels. The Project Site location and TDM strategies would be consistent with regional plans to improve transportation efficiency. In addition, through the incorporation of Project Design Feature GHG-PDF-1 (see Section IV.E, *Greenhouse Gas Emissions*, of this Draft EIR for additional details), the Project will promote alternatives to conventionally fueled automobiles by designating a minimum of eight percent of on-site non-residential parking for carpool and/or alternative-fueled vehicles and shall pre-wire, or install conduit and panel capacity for a minimum of 30

89 SCAG, 2016-2040 RTP/SCS, April 2016, pages 8 and 77.
90 SCAG, 2016-2040 RTP/SCS, April 2016, page 154.

percent of the total provided parking spaces, with 10 percent of the total provided parking spaces to be installed with electric vehicle charging stations.

As a result, operation of the Project and the Project with the East Site Hotel Option would encourage reduced transportation energy consumption and provide residents, visitors, and workers with multiple convenient alternative transportation options. **Therefore, the Project and the Project with the East Site Hotel Option would encourage efficient transportation energy use and efficient transportation alternatives.**

(f) Project Compliance with Existing Energy Standards.

Construction equipment would comply with federal, state, and regional requirements, where applicable. With respect to truck fleet operators, the USEPA and NHSTA have adopted fuel efficiency standards for medium- and heavy-duty trucks. The Phase 1 heavy-duty truck standards apply to combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles for model years 2014 through 2018 and result in a reduction in fuel consumption from 6 to 23 percent over the 2010 baseline, depending on the vehicle type.[91] USEPA and NHTSA also adopted the Phase 2 heavy-duty truck standards, which cover model years 2021 through 2027 and require the phase-in of a 5 to 25 percent reduction in fuel consumption over the 2017 baseline depending on the compliance year and vehicle type.[92] The energy modeling for trucks does not take into account specific fuel reductions from these regulations, since they would apply to fleets as they incorporate newer trucks meeting the regulatory standards; however, these regulations would have an overall beneficial effect on reducing fuel consumption from trucks over time as older trucks are replaced with newer models that meet the standards.

In addition, construction equipment and trucks are required to comply with CARB regulations regarding heavy-duty truck idling limits of five minutes at a location and the phase-in of off-road emission standards that result in an increase in energy savings in the form of reduced fuel consumption from more fuel-efficient engines. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in the efficient use of construction-related energy.

Electricity and natural gas usage during operations, as shown in Table IV.O-2, would be minimized through incorporation of applicable Title 24 standards, applicable CALGreen Code requirements, and the Los Angeles Green Building Code. Furthermore, the Project and the Project with the East Site Hotel Option would incorporate energy-conservation measures beyond regulatory requirements as specified in Project Design Features GHG-PDF-1 and WS-PDF-1 (i.e., the Project and the Project with the East Site Hotel Option would be designed to meet the USGBC LEED Gold Certification including energy performance optimization features, such as reducing building energy cost by a minimum

91 USEPA, Fact Sheet: EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles.

92 USEPA, Federal Register/Vol. 81, No. 206/Tuesday, Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles—Phase 2.

of 11.6 percent for new construction compared to the Title 24 Building Energy Efficiency Standards [2016]; and installing energy efficient appliances that meet the USEPA ENERGY STAR rating standards or equivalent, respectively). The Project and the Project with the East Site Hotel Option would also incorporate water conservation features, such as installing water fixtures that exceed applicable standards, and implementing water-efficient landscaping techniques.

With respect to operational transportation-related fuel usage, the Project and the Project with the East Site Hotel Option would support statewide efforts to improve transportation energy efficiency and reduce transportation energy consumption with respect to private automobiles. Vehicles used by future residents, visitors, and workers would comply with CAFE fuel economy standards and the Pavley and Low Carbon Fuel standards, which are designed to result in more efficient use of transportation fuels. As discussed in detail in Section IV.E, *Greenhouse Gas Emissions*, the Project's mixed-use design and its increase in density located on an infill site within a TPA and a HQTA in proximity to existing high-quality transit, including the Metro Red Line and multiple bus routes; its proximity to existing off-site retail, restaurant, entertainment, commercial, and job destinations; and its highly walkable environment support the conclusion that the Project has been properly designed and located so that its development would achieve a reduction in VMT greater than the Hollywood neighborhood of Los Angeles area average and better than the City and statewide averages. **Thus, based on the information above, construction and operation of the Project and the Project with the East Site Hotel Option would comply with existing energy standards.**

(g) Conclusion Regarding Threshold (a)

As demonstrated by the analyses of the criteria discussed above, the Project would not cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation. The Project's energy usage during peak and base periods would also not conflict with electricity, natural gas, and transportation fuel future projections for the region. During operations, the Project would comply with and exceed existing minimum energy efficiency requirements such as the Title 24 standards and CALGreen Code. In summary, the Project's energy demands would not significantly affect available energy supplies and would comply with existing energy efficiency standards. **Therefore, under the Project or the Project with the East Site Hotel Option, impacts related to energy use under Threshold (a) would be less than significant during construction and operation and not cause wasteful, inefficient, and unnecessary consumption of energy.**

(2) Mitigation Measures

Impacts regarding wasteful, inefficient, and unnecessary consumption of energy were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding to wasteful, inefficient, and unnecessary consumption of energy were determined be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (b): Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

As discussed above, the Project and the Project with the East Site Hotel Option would have differences in quantified energy demands. However, the Project's energy consumption and consistency with applicable energy plans would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

(1) Impact Analysis

A detailed discussion of the Project's and the Project with the East Site Hotel Option's comparison with the applicable actions and strategies in the Green New Deal is provided in Section IV.E, *Greenhouse Gas Emissions*, of this Draft EIR. As discussed, the Project is designed in a manner that is consistent with and not in conflict with relevant energy conservation plans that are intended to encourage development that results in the efficient use of energy resources. The Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the Title 24 standards and CALGreen Code, which have been incorporated into the Los Angeles Green Building Code as amended by the City, to be more stringent than State requirements in LAMC Chapter 9, Article 9 (Los Angeles Green Building Code). In addition to compliance with the Los Angeles Green Building Code, the Project and the Project with the East Site Hotel Option would incorporate energy-and water conservation measures beyond City requirements as specified in Project Design Feature GHG-PDF-1 and Project Design Feature WS-PDF-1 and discussed above.

The Project and the Project with the East Site Hotel Option would also be consistent with and not conflict with regional planning strategies that address energy conservation. As discussed above and in Section IV.E, *Greenhouse Gas Emissions*, as well as Section IV.G, *Land Use and Planning*, of this Draft EIR, SCAG's 2016-2040 RTP/SCS focuses on creating livable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. As part of the approach, the 2016-2040 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, encouraging the reduction of building energy use, and increasing use of renewable sources. The Project's mixed use design and its increase in density located on an infill site within a TPA and an HQTA in proximity to high-quality transit, including the Metro Red Line Hollywood/Vine Station and multiple bus routes; its proximity to existing off-site retail, restaurant, entertainment, commercial, and job destinations; and its highly walkable environment support the conclusion from this analysis that that the Project has been properly designed and located so that its

development would achieve a reduction in VMT greater than the Hollywood neighborhood of Los Angeles area average and better than the City and statewide averages. These land use characteristics would minimize the Project's and the Project with the East Site Hotel Option's VMT and are included in the transportation fuel demand for mobile sources. Additional detailed information regarding these land use characteristics are provided in Section IV.B*, Air Quality* and Section IV.E, *Greenhouse Gas Emissions*, and Section IV.L, *Transportation,* of this Draft EIR.

As a result, the Project would implement Project Design Features and incorporate water conservation, energy conservation, landscaping, and other features consistent with applicable actions and strategies in the City's Green New Deal, as well as sustainability features that go beyond those specified by regulations, such as the Los Angeles Green Building Code. **Therefore, the Project or the Project with the East Site Hotel Option would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency and impacts would be less than significant.**

(2) Mitigation Measures

Impacts regarding conflicts with or obstructing a state or local plan for renewable energy or energy efficiency were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding conflicts with or obstructing a State or local plan for renewable energy or energy efficiency were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (c): Would the Project require or result in the relocation or construction of new or expanded electric power and natural gas facilities, the construction or relocation of which could cause significant environmental effects?

The Project and the Project with the East Site Hotel Option would have highly similar energy demands during construction and only slight differences in quantified energy demands during operations. However, the energy consumption and its effect on energy infrastructure would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the construction impact analysis and construction impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option. The conclusions regarding the operational impact analysis and operational impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option with only minor quantified differences in operational energy demand provided for information.

(1) Impact Analysis

(a) Construction

(i) Electricity

As discussed above, construction activities at the Project Site would require limited and minor quantities of electricity for watering, lighting, power tools and other support equipment. Heavy construction equipment would be powered with diesel fuel. Construction electricity usage would be conservatively considered new as no existing energy demand was assumed (see Subsection, IV.O.2.b)(1), *Existing Conditions – Electricity*, for more details). As existing power lines are located in the vicinity of the Project Site, temporary power poles would be installed to provide electricity during construction. Existing off-site infrastructure would not have to be expanded or constructed to provide electrical service to the Project Site during construction or demolition. As discussed above, the maximum annual average electricity demand during temporary construction under the overlapping construction scenario, which would have a higher annual electricity demand than the sequential construction scenario as it would generate more simultaneous construction activities and associated electricity demand over a shorter construction period, would represent approximately 2.5 percent of the Project annual operational electricity consumption, and 2.4 percent of the annual operational electricity consumption under the Project with the East Site Hotel Option, which would be within the supply and infrastructure capabilities of LADWP. Therefore, construction would not result in an increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

With regard to existing electrical distribution lines, the Project Applicant would be required to coordinate electrical infrastructure removals or relocations with LADWP and comply with site-specific requirements set forth by LADWP, which would ensure that service disruptions and potential impacts associated with grading, construction, and development within LADWP easements are minimized. As such, construction of the Project is not anticipated to adversely affect the electrical infrastructure serving the surrounding uses or utility system capacity. **Therefore, construction of the Project or the Project with the East Site Hotel Option is not anticipated to adversely affect the electrical infrastructure serving the surrounding uses or utility system capacity and would not require the construction of new energy facilities or the expansion of existing facilities**.

(ii) Natural Gas

As stated above, construction activities, including the construction of new buildings and hardscape, typically do not involve the consumption of natural gas. Accordingly, natural gas would not generally be expected to be used for Project construction activities; thus, there would be no expected demand generated by construction. If natural gas is used during construction, it would be in limited amounts and on a temporary basis and would

specifically be used to replace or offset diesel-fueled equipment and, as such, would not result in substantial on-going demand. **Therefore, construction of the Project or the Project with the East Site Hotel Option would not require the construction of new energy facilities or the expansion of existing facilities.**

(b) Operations

(i) Electricity

As shown in Table IV.O-2, the increase in annual operational electricity consumption of 6,128,997 kWh per year from buildout of the Project's West Site in 2024 would represent approximately 0.026 percent of LADWP's projected sales in 2024 and, therefore, would be within LADWP's projected electricity supplies. Under the overlapping construction schedule, full buildout of the Project would result in an increase in annual electricity consumption in 2025 of 11,768,088kWh per year (representing approximately 0.050 percent of LADWP's projected sales in 2025) and 12,252,572 kWh under the Project with the East Site Hotel Option (representing approximately 0.052 percent of LADWP's projected sales in 2025). Therefore, the Project and the Project with the East Site Hotel Option would both be within LADWP's projected electricity supplies. Under the sequential construction schedule, full buildout of the Project and the Project with the East Site Hotel Option in 2027 would represent approximately 0.049 percent and 0.051 percent of LADWP's projected sales in 2027, respectively, and therefore, would both be within LADWP's projected electricity supplies.

Based on the Project's Utility Infrastructure Technical Report, the Project's West Site would be designed with an electricity infrastructure that could accommodate a maximum instantaneous peak demand of 12,366 kW.[93,94] In comparison to the LADWP power grid base peak load of 6,029 MW for 2024-2025, based on the assumption above, the Project's West Site would represent approximately 0.21 percent of the LADWP base peak load conditions.[95]

Based on the Project's Utility Infrastructure Technical Report, under peak conditions, full buildout of the Project under the overlapping scenario in 2025would be designed with an electricity infrastructure that could accommodate a maximum instantaneous peak demand of 24,016 kW. Full buildout of the Project with the East Site Hotel Option under the overlapping scenario in 2025 would be designed with an electricity infrastructure that could accommodate a maximum instantaneous peak demand of 25,539 kW.[96,97] In comparison to the LADWP power grid base peak load of 6,076 MW for 2025–2026, based

93 KPFF Consulting Engineers, Utility Technical Report, January 3, 2019. Provided in Appendix P-1 of this Draft EIR.
94 For electrical power, 1 kilo-volt ampere is equal to 1 kilowatt.
95 Calculated as follows: 12,366 kW / 6,029,000 kW = 0.21%.
96 KPFF Consulting Engineers, Utility Technical Report, January 3, 2019. Provided in Appendix P-1 of this Draft EIR.
97 For electrical power, 1 kilo-volt ampere is equal to 1 kilowatt.

on the assumption above, the Project and the Project with the East Site Hotel Option would represent approximately 0.40 percent and 0.42 percent of the LADWP base peak load conditions, respectively.[98] In comparison to the LADWP power grid base peak load of 6,182 MW for 2026-2027, based on the assumption above, full buildout of the Project and the Project with the East Site Hotel Option under the sequential scenario in 2027 would represent approximately 0.39 percent and 0.41 percent of the LADWP base peak load conditions, respectively.[99] The peak values listed above represent maximum building design capacity loads; thus, the Project would not be expected to generate maximum instantaneous peaks at these levels – actual peak demands would be less than that the values listed above. The LADWP 2017 Power Strategic Long-Term Resource Plan identifies adequate resources (natural gas, coal) to support future generation capacity.[100] The Project and the Project with the East Site Hotel Option would not require additional infrastructure (i.e., a substation) beyond proposed utilities installed on-site during construction. Furthermore, LADWP has stated that "electric service is available and will be provided in accordance with the Los Angeles Department of Water and Power's Rules Governing Water and Electric Service" and that "the estimated power requirement for this proposed project is part of the total load growth of the City's power system."[101] Therefore, it is expected that LADWP's existing infrastructure, planned electricity capacity and electricity supplies would be sufficient to support the electricity demand. **Based on the required load forecast projections by LADWP, this utility would be expected to meet the Project's and the Project with the East Site Hotel Option's demand, and the operational electricity services and supply and infrastructure impacts would be less than significant and would not require the construction of new energy facilities or the expansion of existing facilities**.

(ii) Natural Gas

As shown in Table IV.O-2, the Project's West Site is projected to generate an increase in the on-site annual demand for natural gas totaling approximately 7,871,569 kBtu per year. Full buildout of the Project would result in a projected increase in the on-site annual demand for natural gas totaling approximately 16,535,490 kBtu. Full buildout of the Project with the East Site Hotel Option would result in a projected increase in the on-site annual demand for natural gas totaling approximately 18,448,420 kBtu.

The Project's West Site would account for approximately 0.0009 percent of the 2024 forecasted annual supplies in SoCalGas' planning area and, therefore, would fall within

98 Calculated as follows: 24,016 kW / 6,076,000 kW = 0.40% and 25,359 kW / 6,076,000 kW = 0.42%.

99 Calculated as follows: 24,016 kW / 6,182,000 kW = 0.39% and 25,359 kW / 6,182,000 kW = 0.41%.

100 LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, page ES-25. "…the 2017 SLTRP outlines an aggressive strategy for LADWP accomplish its goals, comply with regulatory mandates, and provide sufficient resources over the next 20 years given the information presently available…"

101 LADWP, 1720-1770 N Vine St; 1746-1760 N Ivar Ave; 1733 & 1741 Argyle Ave; 6236, 6270, 6334 W Yucca St, Los Angeles, California 90028, Letter from Ralph Jaramillo to KPFF, dated October 1, 2018.

SoCalGas' projected supplies for the area in 2024.[102] The Project and the Project with the East Site Hotel Option would account for approximately 0.0018 percent and 0.0020 percent of the 2025 forecasted annual supplies in SoCalGas' planning area, respectively, and, therefore, both would fall within SoCalGas' projected supplies for the area in 2025.[103] The Project and the Project with the East Site Hotel Option would account for approximately 0.0018 percent and 0.0021 percent of the 2027 forecasted annual supplies in SoCalGas' planning area, respectively, and, therefore, both would fall within SoCalGas' projected supplies for the area in 2027.

SoCalGas expects overall natural gas demand to decline through 2035, even accounting for population and economic growth, with efficiency improvements and the State's transition away from fossil fuel-generated electricity to increased renewable energy. The 2018 California Gas Report states, "SoCalGas projects total gas demand to decline at an annual rate of 0.5% from 2018 to 2035. The decline in throughput demand is due to modest economic growth, CPUC-mandated energy efficiency (EE) standards and programs, renewable electricity goals, the decline in commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (AMI)."[104] Furthermore, SoCalGas has stated that it has "facilities in the area" of the Project Site and that "service would be in accordance with SoCalGas' policies and extension rules on file with the California Public Utilities Commission (Commission) at the time contractual arrangements are made."[105] Based on the Project's and the Project with the East Site Hotel Option's small fraction of total natural gas consumption for the region, ongoing SoCalGas long-range planning efforts to provide natural gas for this service region, and sufficient existing infrastructure, it is expected that SoCalGas' existing and planned natural gas supplies and infrastructure would be sufficient to meet the demand for natural gas. **Based on the required load forecast projections by SoCalGas, the utility would be expected to meet the Project's and the Project with the East Site Hotel Option's demand and natural gas services, and operation would not significantly affect the available natural gas supply or distribution infrastructure and, therefore, would not require the construction of new energy facilities or the expansion of existing facilities.**

(c) Conclusion Regarding Threshold (c)

As demonstrated by the analyses above, construction and operation of the Project and the Project with the East Site Hotel Option would not result in an increase in demand for electricity, or natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. **Therefore, Project and the Project with the East Site Hotel Option impacts related**

102 California Gas and Electric Utilities, 2018 California Gas Report, 2018, page 103.
103 California Gas and Electric Utilities, 2018 California Gas Report, 2018, page 103.
104 California Gas and Electric Utilities, 2018 California Gas Report, 2018, page 4.
105 Southern California Gas Company, Will Service Letter Request for – Job ID# 43-2018-08-00068: 5546-030-034; 5546-030-028; 5546-030-032; 5546-030-031; 5546-030-033, Letter from Pedro Reyes to KPFF, dated October 8, 2018.

to energy supplies and infrastructure capacity under Threshold (c) would be less than significant during construction and operation.

(2) Mitigation Measures

Impacts regarding to energy supplies and infrastructure capacity were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding to energy supplies and infrastructure capacity were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

As analyzed above, the Project and the Project with the East Site Hotel Option would have differences in quantified energy demands. However, the Project's energy consumption, consistency with applicable energy plans, and its effect on energy infrastructure would be essentially the same under the Project and the Project with the East Site Hotel Option. Thus, the conclusions regarding the cumulative impact analysis and impact significance presented below are the same and apply to the Project and the Project with the East Site Hotel Option.

(1) Impact Analysis

(a) Significance Threshold (a): Wasteful, Inefficient and Unnecessary use of Energy

Cumulative impacts occur when impacts that are significant or less than significant from a proposed project combine with similar impacts from other past, present, or reasonably foreseeable projects in a similar geographic area. As presented in Chapter III, *Environmental Setting*, of this Draft EIR, Table III-1, the City has identified 150 related projects located within a two-mile radius of the Project Site, 27 of which are located in the City of West Hollywood and outside of LADWP's coverage area for electricity (LADWP provides water service for the eastern side of the City of West Hollywood). The geographic context for the analysis of cumulative impacts on electricity is LADWP's service area, and the geographic context for the analysis of cumulative impacts on natural gas in SoCalGas' service area because the Project and related projects are located within the service boundaries of LADWP and SoCalGas. While the geographic context for transportation-related energy use is more difficult to define, the City has determined to consider the Project in the context of County-wide consumption given the tendency for vehicles to travel within and through the County and the availability of County-level data. Growth within these geographies is anticipated to increase the demand for electricity, natural gas, and transportation energy, as well as the need for energy infrastructure, such as new or expanded energy facilities.

(i) Electricity

Buildout of the Project or the Project with the East Site Hotel Option, related projects, and additional forecasted growth in LADWP's service area would cumulatively increase the demand for electricity supplies and on infrastructure capacity. However, LADWP, in coordination with the CEC, account for future increases in service area demand based on various economic, population, and efficiency factors. LADWP relies on multiple forms of data from various agencies, including historical sales from the General Accountings Consumption and Earnings report, historical Los Angeles County employment data provided from the State's Economic Development Division, PEV projections from the CEC account building permits when determining electricity Load Forecasts, solar rooftop installations from the Solar Energy Development Group, electricity price projections from the Financial Services organization, and LADWP program efficiency forecasts.[106] In addition, LADWP considers projected Los Angeles County building permit amounts calculated by the UCLA Anderson School of Management when determining its load forecast and would therefore account for the Project's and the related projects' electricity demand within its forecasts.[107] Thus, LADWP considers growth from related projects within its service area for the increase in demand for electricity, as well as the need for energy infrastructure, such as new or expanded energy facilities.

The Project and the Project with the East Site Hotel Option would incorporate additional energy efficiency measures outlined in Project Design Feature GHG-PDF-1 and Project Design Feature WS-PDF-1 (refer to Section IV.E, *Greenhouse Gas Emissions*, and Section IV.N.2, *Water Supply*, of this Draft EIR, respectively). Related projects, as with the Project, would be required to evaluate energy impacts during construction and operation related to the wasteful, inefficient or unnecessary use of electricity, incorporate energy conservation features, comply with applicable regulations including the Los Angeles Green Building Code, the Title 24 standards and CALGreen Code, and incorporate mitigation measures, as necessary under CEQA.

Additionally, as discussed above, LADWP is required to procure a minimum of 33 percent of its energy portfolio from eligible renewables sources by 2020. LADWP's current sources of renewable energy include biomass and biowaste, geothermal, hydroelectric, solar and wind, and accounted for 32 percent of LADWP's overall energy mix, the most recent year for which data are available.[108] This represents the available off-site renewable sources of energy that could meet the Project's and related projects energy demand. Therefore, the Project and the Project with the East Site Hotel Option and related projects would comply with the energy conservation plans and efficiency standards required to ensure efficient energy use. **As such, the Project's and the Project with the East Site Hotel Option's contribution to cumulative impacts due to wasteful,**

106 LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, page 70.
107 LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, page 67.
108 LADWP, Power Content Label, Version: July 2019,

inefficient and unnecessary use of electricity would not be cumulatively considerable, and, thus, cumulative impacts would be less than significant.

(ii) Natural Gas

Buildout of the Project or the Project with the East Site Hotel Option, related projects, and additional forecasted growth in SoCalGas' service area would cumulatively increase the demand for natural gas supplies and on infrastructure capacity. As stated above, based on the 2018 California Gas Report, California Energy and Electric Utilities, which a collective of California utility companies, estimates natural gas supplies within SoCalGas' planning area will be approximately 923,282 million kBtu in 2024, 914,971 million kBtu in 2025 and 897,971 million kBtu in 2027.[109]

As stated above, SoCalGas forecasts take into account projected population growth and development based on local and regional plans, and the Project's growth and development would not conflict with those projections. The Project would also incorporate additional energy efficiency measures outlined in Project Design Feature GHG-PDF-1 (refer to Section IV.E, *Greenhouse Gas Emissions*, of this Draft EIR).

Related projects, as with the Project and the Project with the East Site Hotel Option, would be required to evaluate energy impacts during construction and operation related to the wasteful, inefficient or unnecessary use of natural gas, incorporate energy conservation features, comply with applicable regulations including the Los Angeles Green Building Code, the Title 24 standards and CALGreen Code, and incorporate mitigation measures, as necessary under CEQA.

As such, the Project's and the Project with the East Site Hotel Option's contribution to cumulative impacts due to wasteful, inefficient and unnecessary use of natural gas would not be cumulatively considerable, and, thus, cumulative impacts would be less than significant.

(iii) Transportation Energy

Buildout of the Project or the Project with the East Site Hotel Option, related projects, and additional forecasted growth would cumulatively increase the demand for transportation-related fuel in the state and region. The Project's operational transportation fuel consumption for the Project West Site in year 2024, the Project and Project with the East Site Hotel Option in year 2025, and the Project and Project with the East Site Hotel Option in year 2027 are shown above in Table. IV.O-2. For comparison purposes, in 2024, the Project's West Site would account for 0.0040 percent of County gasoline consumption and 0.0037 percent of County diesel consumption (based on the available County fuel sales data for the year 2017). In 2025, the Project would account for 0.0082 percent of County gasoline consumption and 0.0078 percent of County diesel consumption. The Project with the East Site Hotel Option would account for 0.0097 percent of County gasoline consumption and 0.0089 percent of County diesel consumption. In 2027, the

109 California Gas and Electric Utilities, 2018 California Gas Report, 2018, page 103.

Project would account for 0.0077 percent of County gasoline consumption and 0.0078 percent of County diesel consumption. The Project with the East Site Hotel Option would account for 0.0091 percent of County gasoline consumption and 0.0089 percent of County diesel consumption, as shown in Appendix Q of this Draft EIR.

Additionally, as described above, petroleum currently accounts for 90 percent of California's transportation energy sources; however, over the last decade the State has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHGs from the transportation sector, and reduce vehicle miles traveled which would reduce reliance on petroleum fuels.

The Project and the Project with the East Site Hotel Option would not conflict with the energy efficiency policies emphasized by the 2016-2040 RTP/SCS. As discussed previously, the Project Site is located at an infill location in the highly urbanized and generally built out active regional center of the Hollywood neighborhood of Los Angeles near a mix of existing commercial, hotel, studio/production, office, entertainment, and residential uses, and within an identified TPA that is within a quarter-mile of multiple public transportation options, including the Metro Red Line Hollywood/Vine Station and is also within a quarter mile of multiple Metro bus routes and LADOT DASH lines. Therefore, operation of the Project would provide residents, visitors, and workers with alternative transportation options, and the implementation of construction features would minimize traffic flow congestion and reduce idling times and construction transportation fuel use.

The 2016-2040 RTP/SCS is a regional planning tool that addresses cumulative growth and resulting environmental effects and is applicable to the Project and related projects with respect to transportation energy efficiency. Related projects would be required under CEQA to evaluate if their respective developments would result in wasteful, inefficient or unnecessary use of transportation energy. Furthermore, related projects would be required to implement mitigation measures, as needed, if found to result in wasteful, inefficient or unnecessary use of transportation energy.

Since the Project and the Project with the East Site Hotel Option would be consistent with the 2016-2040 RTP/SCS, its contribution to cumulative impacts due to wasteful, inefficient or unnecessary use of transportation fuel would not be cumulatively considerable, and, thus, cumulative impacts would be less than significant.

(iv) Conclusion

Based on the analysis provided above, the Project's and the Project with the East Site Hotel Option's contribution to cumulative impacts related to energy consumption (i.e., electricity, natural gas, and transportation energy) would not result in a cumulatively considerable effect related to potentially significant environmental impacts due to the wasteful, inefficient and unnecessary consumption of energy during construction or operation. As such, the Project's and the Project with the East Site Hotel Option's impacts would not be cumulatively considerable; therefore, cumulative energy impacts under Threshold (a) are concluded to be less than significant.

(b) Significance Threshold (b): State or Local Plan Analysis

(i) Electricity

Buildout of the Project or the Project with the East Site Hotel Option, related projects, and additional forecasted growth in LADWP's service area would cumulatively increase the demand for electricity supplies and on infrastructure capacity. However, as discussed above, LADWP and the CEC account for increases in demand and load forecast based on various economic, population, and efficiency factors and relies on multiple forms of data from various agencies.[110] In addition, LADWP considers projected Los Angeles County building permit amounts when determining its load forecast and would therefore account for the Project's and the related projects' electricity demand within its forecasts.[111]

Moreover, the Project and the Project with the East Site Hotel Option would also incorporate energy efficiency measures outlined in Project Design Feature GHG-PDF-1 and Project Design Feature WS-PDF-1 (refer to Section IV.E, *Greenhouse Gas Emissions*, and Section IV.N.2, *Water Supply*, of this Draft EIR) that go beyond applicable required City and State energy plans and standards. Related projects, as with the Project, would be required to evaluate electricity conservation features and compliance with applicable electricity efficiency plans and standards including the Los Angeles Green Building Code, the Title 24 standards and CALGreen Code, and incorporate mitigation measures, as necessary under CEQA. Related projects, as with the Project, would also be required to evaluate potential impacts related to consistency with the City's Green New Deal standards, and local and regional supplies or capacity based on regional growth plans, such as the SoCalGas energy supply projections for long-term planning.

As such, the Project's and the Project with the East Site Hotel Option's contribution to cumulative impacts due to conflicting with or obstruction of a state or local plan for renewable energy or energy efficiency would not be cumulatively considerable, and, thus, cumulative impacts would be less than significant.

110 LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, page 70.
111 LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, page 67.

(ii) Natural Gas

Buildout of the Project or the Project with the East Site Hotel Option, related projects, and additional forecasted growth in SoCalGas' service area would cumulatively increase the demand for natural gas supplies and on infrastructure capacity. However, as discussed above, SoCalGas forecasts take into account projected population growth and development based on local and regional plans, and the Project's growth and development would not conflict with those projections.

The Project and the Project with the East Site Hotel Option would also incorporate additional energy efficiency measures outlined in Project Design Feature GHG-PDF-1 (refer to Section IV.E, *Greenhouse Gas Emissions*, of this Draft EIR) that go beyond applicable required City and State energy plans and standards. Related projects, as with the proposed Project, would be required to evaluate natural gas conservation features and compliance with applicable regulations including the Los Angeles Green Building Code, the Title 24 standards and CALGreen Code, and incorporate mitigation measures, as necessary under CEQA. Related projects, as with the Project, would also be required to evaluate potential impacts related to consistency with the City's Green New Deal standards, and local and regional supplies or capacity based on regional growth plans, such as the SoCalGas energy supply projections for long-term planning.

As such, the Project's and the Project with the East Site Hotel Option's contribution to cumulative impacts due to conflicting with or obstruction of a state or local plan for renewable energy or energy efficiency would not be cumulatively considerable, and, thus, cumulative impacts would be less than significant.

(iii) Transportation Energy

Buildout of the Project or the Project with the East Site Hotel Option, related projects, and additional forecasted growth would cumulatively increase the demand for transportation-related fuel in the state and region. However, as discussed above, the Project would not conflict with the energy efficiency policies emphasized by the 2016-2040 RTP/SCS. As discussed previously, the Project would be consistent with and not conflict with SCAG's land use type for the area and would encourage alternative transportation and achieve a reduction in VMT resulting in a transportation efficiency level better than the Hollywood neighborhood of Los Angeles area average and better than the City and statewide averages.

The 2016-2040 RTP/SCS is a regional planning tool that addresses cumulative growth and resulting environmental effects and is applicable to the Project and the Project with the East Site Hotel Option, and related projects with respect to transportation energy efficiency. Related projects would be required under CEQA to evaluate if their respective developments would conflict with the energy efficiency policies emphasized by the 2016-2040 RTP/SCS, such as the per capita VMT targets, promotion of alternative forms of transportation, proximity to public transportation options, provisions for encouraging multi-modal and energy efficient transit such as by accommodating bicycle parking and EV

chargers at or above regulatory requirements. Furthermore, related projects would be required to implement mitigation measures, as needed, if found to be in conflict with applicable provisions of the SCAG 2016-2040 RTP/SCS for the land use type.

Since the Project and the Project with the East Site Hotel Option would be consistent with the 2016-2040 RTP/SCS, its contribution to cumulative impacts related to potentially significant environmental impacts due to conflicting with or obstruction of a state or local plan for transportation energy efficiency would not be would not be cumulatively considerable and, thus, would be less than significant.

(iv) Conclusion Regarding Threshold (b)

Based on the analysis provided above, the Project's and the Project with the East Site Hotel Option's contribution to cumulative impacts related to conflicting with or obstruction of a state or local plan for renewable energy or energy efficiency would not be cumulatively considerable; therefore, cumulative energy impacts under Threshold (b) are concluded to be less than significant.

(c) Significance Threshold (c): Infrastructure Capacity Analysis

(i) Electricity

Electricity infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by LADWP are ongoing. As described in LADWP's 2017 Power Strategic Long-Term Resource Plan, LADWP would continue to expand delivery capacity as needed to meet demand increases within its service area at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards.[112] The 2017 Power Strategic Long-Term Resource Plan takes into account future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements.[113] In addition, LADWP considers projected Los Angeles County building permit amounts when determining its load forecast and would therefore account for the Project's and the related project's electricity demand within its projections.[114] Development projects within the LADWP service area would also be anticipated to incorporate site-specific infrastructure improvements, as necessary. Thus, LADWP considers growth from related projects within its service area for the need for energy infrastructure, such as new or expanded energy facilities.

Each of the related projects would be reviewed by the local utility provider to identify necessary electricity service connections to meet the needs of their respective projects. In addition, the local utility provider would provide service letters for each related project confirming availability of adequate electricity supplies as part of the total load growth of the regional power system. Project applicants would be required to provide for the needs

112 LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, page ES-2.
113 LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, page ES-2.
114 LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, page 67.

of their individual projects, thereby contributing to the electrical infrastructure in the Project Site area. Related projects would also be required to evaluate electricity demands and coordinate with the local utility provider for providing adequate service, in accordance with future projected supplies, to each of the related project sites. Related projects would be required to obtain evidence of service from LADWP, or the appropriate utility provider, to ensure that electric service would be available and provided to meet related project demands. Furthermore, the related projects are generally infill projects in a highly urbanized area already served by existing facilities and are generally residential, mixed-use, and commercial projects and not high-energy demand facilities, such as heavy industrial uses.

As such, the Project's and the Project with the East Site Hotel Option's contribution to cumulative impacts due to the relocation or construction of new or expanded electric power facilities, the construction or relocation of which could cause significant environmental effects, would not be cumulatively considerable, and, thus, cumulative impacts would be less than significant.

(ii) Natural Gas

Natural gas infrastructure is typically expanded in response to increasing demand and system expansion and improvements by SoCalGas occur as needed.[115] Development projects within SoCalGas' service area, including the Project and related projects also served by the existing SoCalGas infrastructure, would also be anticipated to incorporate site-specific infrastructure improvements, as appropriate.

Each of the related projects would be reviewed by SoCalGas to identify necessary natural gas service connections to meet the needs of their respective projects. In addition, SoCalGas would provide service letters for each related project confirming availability of adequate natural gas supplies as part of the total load growth of the regional natural gas system. Project applicants would be required to provide for the needs of their individual projects, thereby contributing to the natural gas infrastructure in the Project area. Related projects would also be required to evaluate natural gas demands and coordinate with the local utility provider for providing adequate service, in accordance with future projected supplies, to each of the related project sites. Related projects would also be required to obtain evidence of service from SoCalGas, or the appropriate utility provider, to ensure that natural gas service would be available and provided to meet related project demands. Furthermore, the related projects are generally infill projects in a highly urbanized area already served by existing facilities and are generally residential, mixed-use, and commercial projects and not high-energy demand facilities, such as heavy industrial uses.

As such, the Project's and the Project with the East Site Hotel Option's contribution to cumulative impacts due to the relocation or construction of new or expanded natural gas facilities, the construction or relocation of which could cause

115 Southern California Gas Company, History of SoCalGas, 2018, https://www.socalgas.com/company-history accessed January 7, 2019.

significant environmental effects, would not be cumulatively considerable, and, thus, cumulative impacts would be less than significant.

(iii) Conclusion Regarding Threshold (c)

Based on the analyses provided above, the Project and the Project with the East Site Hotel Option's contribution to cumulative impacts due to the relocation or construction of new or expanded electric power and natural gas facilities, the construction or relocation of which could cause significant environmental effects, would not be cumulatively considerable. As such, cumulative energy impacts Threshold (c) are concluded to be less than significant.

(2) Mitigation Measures

Cumulative impacts regarding energy were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts regarding energy were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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V. Alternatives

1. Introduction

Under CEQA, and as indicated in California Public Resources Code (PRC) Section 21002.1(a), the identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process intended to consider ways to mitigate or avoid the significant environmental effects of a project.

Guidance regarding the definition of project alternatives is provided in CEQA Guidelines Section 15126.6(a) and is summarized in part in the excerpt below.

> *An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.*

The CEQA Guidelines emphasize that the selection of project alternatives should be based primarily on the ability of the alternative to avoid or substantially lessen significant impacts relative to the proposed project, "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."[1] The CEQA Guidelines further direct that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are analyzed.[2]

The project alternatives selected for analysis in an EIR, must be potentially feasible. CEQA Guidelines Section 15126.6(f)(1) states that:

> *Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent).*

1 CEQA Guidelines Section 15126.6(b).
2 CEQA Guidelines Section 15126.6(f).

CEQA Guidelines Section 15626.6(e) requires the analysis of a "no project" alternative and, depending on the circumstances, evaluation of alternative location(s) for the project, if feasible.[3] Based on the alternatives analysis, an environmentally superior alternative is to be designated. In general, the environmentally superior alternative is the alternative with the least adverse impacts on the environment. If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify another environmentally superior alternative among the other alternatives.[4]

CEQA Guidelines Section 15126.6(d) states that the EIR is required to provide sufficient information about each alternative to allow meaningful evaluation, analysis and comparison with the proposed project. It further states that, if an alternative would cause one or more significant effects in addition to those that would be caused by the proposed project, the alternatives analysis need not discuss those effects in the same level of detail as the significant effects of the proposed project are discussed.

2. Objectives of the Project

Chapter II, *Project Description*, of this Draft EIR sets forth the Project Objectives defined by the Applicant and the Lead Agency. The underlying purpose of the Project is to create a mixed-use development in the Hollywood community that provides residents, employees, and visitors with an active open space area and to create a design that contributes to the unique landmarks of the Capitol Records Complex and legacy of the Hollywood area.

1. Redevelop the Project Site, with a mixed-use development that protects the architectural and historical heritage of the Capitol Records Complex and activates Hollywood Boulevard, Vine Street, and surrounding streets through connected, publicly available landscaped open space, including a paseo with shopping, seating, open air dining, and art installations, and plazas accommodating performances and community focused events.

2. Create a hub of activity surrounding the Capitol Records Complex and the intersection of Hollywood Boulevard and Vine Street, by activating the eastern end of Hollywood Boulevard and the terminus of the Hollywood Walk of Fame, to increase engagement with the Capitol Records Complex.

3. Develop architecturally distinct buildings that are compatible with the Capitol Records Complex through a design that responds to the Capitol Records Building's modernist architectural character, and preserve views of the Capitol Records Building.

3 CEQA Guidelines Sections 15126.6(e), 15126.6(f)(1).
4 CEQA Guidelines Section 15126.6(e)(2).

4. Maintain prominent views of the Capitol Records Building by providing building setbacks, visual buffers, open space between the Project's new buildings and the Capitol Records Complex, and safe public viewing areas from the proposed paseo and plazas, to maximize view corridors and continue showcasing its distinctive architectural design.

5. Promote local, regional, and State land use and mobility objectives and reduce vehicle miles traveled (VMT) by maximizing infill development within an existing Regional Center near jobs, retail, and entertainment in proximity to transit and transportation infrastructure that encourages pedestrian activity.

6. Provide affordable senior housing with outdoor spaces in proximity to public transportation, allowing an age-specific demographic to continue to live in their residence of preference while maintaining access to services and goods.

7. Cluster jobs and housing near transit by locating a high-density, mixed-use development within a Transit Priority Area.

8. Support the growth of the City's economic base through the introduction of an economically viable project which creates a significant number of construction and permanent jobs.

9. Activate the Hollywood area with commercial opportunities that could serve local employees, generate local tax revenues, and provide new permanent jobs and housing for residents in support of local business.

10. Incorporate sustainable and green building design and construction to promote resource conservation, including waste reduction, efficient water management techniques, and conservation of energy to achieve a LEED-Gold equivalent building.

3. Overview of Alternatives Selected for Analysis

As stated above, the intent of the alternatives analysis is to determine if there are feasible alternatives that would avoid or substantially reduce the significant impacts of a proposed project. Based on the analysis in Section IV, *Environmental Impact Analysis*, of this Draft EIR, implementation of the Project would result in significant construction impacts that cannot be feasibly mitigated with regard to noise and groundborne noise and vibration, and construction vibration impacts on adjacent, off-site historical buildings. The Project would not result in any significant operational impacts. The following alternatives to the Project have been selected to inform evaluation of the Project in light of the significant environmental impacts of the Project, the objectives established for the Project (listed above), the feasibility of the alternatives considered, public input received during the scoping period, and the existing zoning designation on the Project Site:

- Alternative 1: No Project/No Build Alternative
- Alternative 2: Development under Existing Zoning Alternative
- Alternative 3: Reduced Maximum Height Alternative
- Alternative 4: Office, Hotel and Commercial Alternative
- Alternative 5: Proposed Community Plan Update Compliant Alternative
- Alternative 6: Above-Grade Parking Alternative
- Alternative 7: Primarily Office Alternative
- Alternative 8: Office, Residential and Commercial Alternative

Unlike the Project, none of the Alternatives consider a hotel option on the East Site.

Alternative 1 is a No Project/No Build Alternative pursuant to CEQA Guidelines Section 15126.6(e). Under the No Project/No Build Alternative, the Project would not be developed and existing on-site uses would remain as under the existing conditions.

In addition to the No Project/No Build Alternative, seven development alternatives are included for analysis in this Draft EIR. Four of these alternatives would limit the amount of development to reduce the Project's floor area ratio (FAR) of 6.973:1, with one Alternative reducing FAR to 2.96:1. Another Alternative would allow for all above-grade parking to reduce the scale of the Project's excavation activities and related significant and unavoidable construction noise and vibration impacts. Other Alternatives would contain all-commercial uses, whereas the Project is primarily residential. One Alternative would consist of an equivalent FAR as compared to the Project but would provide a greater balance between residential and commercial uses than the Project. The eight Alternatives, including the No Project/No Build Alternative, are listed below and described in more detail in this chapter. The Alternatives considered for evaluation are compared to the Project and the Project with the East Site Hotel Option, as summarized in **Table V-1**, *Overview of the Project Alternatives,* below.

4. Alternatives Considered and Rejected

CEQA Guidelines Section 15126.6(c) describes that an EIR should identify alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the CEQA Guidelines, the following factors may be used to eliminate alternatives from detailed consideration: the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Alternatives that have been considered and rejected from detailed consideration are discussed below.

TABLE V-1
OVERVIEW OF THE ANALYZED ALTERNATIVES

Use or Feature	Project	Project with the East Site Hotel Option	Alternative 1: No Project/ No Build Alternative	Alternative 2: Development under Existing Zoning	Alternative 3: Reduced Maximum Height	Alternative 4: Office, Hotel and Commercial	Alternative 5: Proposed Community Plan Update Compliant	Alternative 6: Above-Grade Parking	Alternative 7: Primarily Office	Alternative 8: Office, Residential, and Commercial
Maximum Building Heights (including bulkhead)	46 stories, 595' (East Site); 35 stories, 469' (West Site)	46 stories, 595' (East Site); 35 stories, 469' (West Site)	Same as existing (no change)	18 stories, 293' (East Site); 14 stories, 235' (West Site)	23 stories, 353' (East Site); 22 stories, 332.5' (West Site)	12 stories, 222' (East Site); 20 stories, 360' (West Site)	29 stories, 425' (East Site); 20 stories, 304' (West Site)	46 stories, 595' (East Site); 35 stories, 469' (West Site)	29 stories, 506' (East Site); 27 stories, 469' (West Site)	17 stories, 367' (East Site) 48 stories, 595' (West Site)
Total Residential Units	1,005 du	884 du	0	384 du	952 du	0	672 du	1,005 du	0	903 du
Market Rate Units	872 du	768 du	0	384 du	827 du	0	583 du	872 du	0	770 du
Senior Affordable Units	133 du	116 du	0	0	125 du	0	89 du	133 du	0	133 du
Hotel	0	220 rooms; 130,278 sf	0	0	0	324 rooms; 146,698 sf	0	0	0	0
New Office Floor Area	0	0	0	0	0	603,060 sf	0	0	1,063,152 sf	386,347 sf
Retail/ Restaurant	30,176 sf	30,176 sf	0	30,176 sf	30,176 sf	30,176 sf	30,176 sf	30,176 sf	31,568 sf	27,140 sf
Total Publicly Accessible Open Space	33,922 sf	33,922	0	36,141 sf	35,664 sf	32,657 sf	36,551 sf	24,541	24,900 sf	33,105 sf
East Site Publicly Accessible Open Space	24,990 sf	24,990 sf	0	23,671 sf	23,481 sf	23,637 sf	23,671 sf	12,794 sf	12,050 f	22,890 sf
Use or Feature	Project	Project with the East Site Hotel Option	Alternative 1: No Project/No Build Alternative	Alternative 2: Development under Existing Zoning	Alternative 3: Reduced Maximum Height	Alternative 4: Office, Hotel and Commercial	Alternative 5: Proposed Community Plan-Update Compliant	Alternative 6: Above-Grade Parking	Alternative 7: Primarily Office	Alternative 8: Office, Residential and Commercial

TABLE V-1
OVERVIEW OF THE ANALYZED ALTERNATIVES

Use or Feature	Project	Project with the East Site Hotel Option	Alternative 1: No Project/ No Build Alternative	Alternative 2: Development under Existing Zoning	Alternative 3: Reduced Maximum Height	Alternative 4: Office, Hotel and Commercial	Alternative 5: Proposed Community Plan Update Compliant	Alternative 6: Above-Grade Parking	Alternative 7: Primarily Office	Alternative 8: Office, Residential, and Commercial
West Site Publicly Accessible Open Space	8,932 sf	8,932 sf	0	12,470 sf	12,183 sf	9,020 sf	12,880 sf	11,747 sf	12,850 sf	10,215 sf
Parking Spaces Required	1,513 spaces	1,472 spaces	0	493 spaces	990 spaces	1,461 spaces	746 spaces	1,513 spaces	2,287 spaces	2,062 spaces
Parking Spaces Provided	1,521 spaces	1,521 spaces	0	493 spaces	1,383 spaces	1,461 spaces	746 spaces	1,521 spaces	2,745 spaces	2,237 spaces
Depth of Excavation for Subterranean Parking [a]	64' East Site; 64' West Site (Five levels)	64' East Site; 64' West Site (Five levels)	0	33' East Site; 22' West Site (Three levels and two levels)	64' East Site; 64' 'West Site (Five levels)	64' East Site; 64' West Site (Five levels)	44' East Site; 33' West Site (Four levels and three levels)	0' East Site; 0' West Site	33' East Site; 50' West Site (Three levels and Four levels)	64' East Site; 60' West Site (Four Levels)
Household VMT per Capita	4.8	4.7	N/A	4.8	4.8	N/A	4.7	4.8	N/A	4.5
Work VMT per Employee	N/A	4.8	N/A	N/A	N/A	5.0	N/A	N/A	4.5	4.7
Total New Floor Area	1,287,150 sf	1,277,741 sf	0	480,516 sf	1,097,466 sf	789,967 sf	789,921 sf	1,286,634 sf	1,094,720 sf	1,287,100 sf
FAR	6.973:1	6.901:1	0	2.96:1	6.031:1	4.501:1	4.5:1	6.972:1	6.017:1	6.973:1

[a] Depths for the Project and the Project with the East Site Hotel Option are shown to the approximate depth to the top of the slab and do not include excavation for footings and other foundation features, which would reach a maximum depth of approximately 82 feet below ground surface (bgs). Similarly, depths for the Alternatives are shown to the approximate depth to the top of the slab for comparative purposes and do not include excavation for footings and other foundational features, which, like the Project, could extend an additional 25 feet below the top of slab.

[b] N/A for household VMT indicates no residential component. N/A for work VMT indicates less than 50,000 sf of retail uses and exempt from VMT finding. For purposes of the VMT analysis, hotel uses are analyzed as part of the work VMT per employee.

Source: ESA, 2020.

a) Alternative Off-Site Location

According to the guidance provided by CEQA Guidelines Section 15126.6(f)(2), one or more alternative location(s) for a proposed project should be considered if placing the proposed project in the alternative location would avoid or substantially lessen any of the significant effects of the project to be avoided or substantially lessened; if the EIR concludes that no feasible alternative locations exist, the EIR must disclose the reasons for this conclusion. With the exception of significant and unavoidable construction vibration impacts to historical resources, which under the Project would occur due to the Project's proximity to the Pantages Theatre, Avalon Hollywood, and the Yucca Street/Art Deco Storefront,[5] the Project's significant construction noise and vibration impacts are not site-specific and, as such, moving the location of the Project to another site would not likely reduce the nature and extent of such impacts. Additionally, historic buildings occur throughout much of the Hollywood commercially-zoned area on or near Hollywood Boulevard and other potential commercial locations may have similar proximity to historic buildings where vibration impacts could present an issue. Accordingly, given the nature of the Project's significant unavoidable impacts, evaluation of an alternate location was not pursued as it would be likely to shift these impacts to another location rather than helping avoid or substantially lessen the significant effects of the Project.

In addition to considering whether an alternative site would avoid or substantially lessen impacts, various factors may be considered when addressing the feasibility of an alternative site. Factors considered may include general suitability, economic viability, availability of infrastructure, general plan consistency, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site.[6]

The 4.46-acre Project Site spans portions of two City blocks generally bounded by Yucca Street to the north, Argyle Street to the east, adjacent development and Hollywood Boulevard to the south, and Ivar Avenue to the west. The Project Site is currently occupied by a single-story storage building and a surface parking lot on the West Site, and the Capitol Records Building and Gogerty Building (the Capitol Records Complex) and surface parking lots that serve the Capitol Records Complex and general public parking on the East Site. The Project Site is located in a Transit Priority Area (TPA) within the designated Hollywood Regional Center, which would be deemed suitable for a high-density, mixed-use development compared to a location outside of the area that is not within a TPA or one of the City's designated regional centers. The Project Site would allow for commercial and high-density residential uses in close proximity to public transit, including the

5 Significant and unavoidable vibration impacts would only occur if owners of these facilities would not agree to proposed monitoring and mitigation.

6 CEQA Guidelines, Sections 15126.6(f)(1) and 15126.6(f)(2).

Metro Red Line Hollywood/Vine Station and numerous Metro and LADOT bus routes with multiple stops within one block of the Project Site.

An off-site location would not meet the primary Project Objective to redevelop a Project Site that is located in immediate proximity to the Capitol Records Complex and the Hollywood Boulevard and Vine Street intersection, into a mixed-use development that activates these and surrounding streets through the provision of publicly accessible open space. In accordance with Metro's initiatives to spur transit-oriented development around its stations, the Metro Red Line Hollywood/Vine Station has become a prime target for community regeneration. As discussed in Chapter III, *General Description of the Environmental Setting*, of this Draft EIR, approximately 150 related projects are proposed for the Project Study Area, many of which are located within proximity to the Metro Red Line Hollywood/Vine Station. Considering the development pressure within the TPA, available building sites of a size to accommodate the scale and density of the Project are scarce. It is not anticipated that the Applicant would be able to find an equivalent-sized building site that is not the subject of another building project in proximity to the Metro Red Line Hollywood/Vine Station or that is not near any of Hollywood's historic buildings. In addition, the Applicant does not have ownership or control of any other suitable site in the Hollywood area, and their current investment is specifically in the Project Site. Therefore, the flexibility to develop a similar project on the same or similar scale at another location in proximity to public transit is not feasible.

A number of the Project's Objectives regarding consideration of the Capitol Records Complex as it relates to the design of the Project and the Project Site would also not be met should the Project be constructed at a different location. For all of the reasons stated above, an off-site location alternative would not meaningfully change the impacts of the Project, and a feasible alternate location for the Project has not been identified. Accordingly, an off-site alternative has not been carried forward for further analysis.

b) Alternative On-Site Uses

An alternative substantially devoted to another use, such as all office on both sites without retail or restaurant space, was considered as an alternative to the proposed mixed-use Project. However, this category of alternative would not fulfill the majority of Project Objectives which generally seek a high-density, mixed-used development consistent with the uses and density envisioned for the Regional Center and Hollywood Center designations of the Project Site and vicinity, including the provision of new housing to help meet market demand within the City. Further, an all office with no retail/restaurant use was not considered because the retail/restaurant use would be fundamental to reducing trips and VMT by the office workers. Other uses, such as low density residential uses or industrial uses were

not considered to be appropriate to the character of the Project Site and surrounding community.

5. Analysis Format

According to the guidance provided by CEQA Guidelines Section 15126.6(d), the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. Each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less than, similar to, or greater than the corresponding impacts of the Project. Furthermore, each alternative is evaluated to determine whether the Project Objectives, identified above, would be substantially attained by the alternative. The evaluation of each of the alternatives follows the process described below:

- A description of the alternative.
- The environmental impacts of the alternative before and after implementation of reasonable mitigation measures for each environmental topic area analyzed in Chapter IV of this Draft EIR are described. Where appropriate, the evaluation is divided between temporary impacts that would occur during the alternative project's construction phase and operational phase.
- Environmental impacts of each alternative as compared to the Project are identified for each environmental topic area addressed in this Draft EIR. Where the impact of the alternative would be clearly less than the impact of the Project, the comparative impact is said to be "less than the Project." Where the alternative's impact would clearly be more than the Project, the comparative impact is said to be "greater than the Project." Where the impacts of the alternative and the Project would be roughly equivalent, the comparative impact is said to be "similar to the Project." The evaluation also documents whether an impact would be entirely avoided, whether a significant impact could be reduced to a less-than-significant level, or whether a significant unavoidable impact could be reduced to a less-than-significant level when compared to the Project.
- The comparative analysis of the impacts is followed by a general discussion of the extent to which the underlying purpose and Project Objectives are attained by the alternative.

Unless otherwise specified, references to the "Project" throughout this alternatives analysis apply to both the Project and the Project with the East Side Hotel Option. However, where numerical factors are cited and may differ between the Project and the Project with the East Side Hotel Option, the analysis presents and discusses separately the numerical factors for both. At the end of this chapter, a relative comparison of each alternative's impacts and their ability to achieve Project Objectives, is provided. Additionally, pursuant to CEQA Guidelines Section 15126.6(e)(2), an "Environmentally Superior Alternative" is identified.

6. Alternatives Analysis

a) Alternative 1: No Project/No Build Alternative

(1) Description of the Alternative

In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. CEQA Guidelines Section 15126.6(e)(3)(B) states that, "in certain instances, the No Project/No Build Alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, the No Project/No Build Alternative (Alternative 1) assumes that no new development would occur within the Project Site. The portion of the Project Site that would have been occupied by the Project would continue to operate as paved surface parking lots and a small storage building (West Site) and the Capitol Records Complex (East Site).

(2) Environmental Impacts

(a) Aesthetics

Senate Bill (SB) 743 (codified in PRC Section 21099(d)(1)) and Zoning Information (ZI) File No. 2452 provide that a mixed-use project in a designated urban TPA site is not required to evaluate physical aesthetic impacts pertaining to scenic vistas, scenic resources, and light and glare in an EIR. Although the Project meets these criteria and recognizing that SB 743/ZI No. 2452 do not apply to the No Project/No Build Alternative, for disclosure purposes only, information based on City thresholds is provided relative to scenic vistas, scenic resources, and light and glare.

As aesthetics impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of the No Project/No Build Alternative apply to both the Project and the Project with the East Site Hotel Option.

(i) Scenic Vistas

Under the No Project/No Build Alternative, no new buildings would be constructed, and no changes would occur with respect to existing conditions on the Project Site. Accordingly, because the No Project/No Build Alternative would not result in any changes to the Project Site, no effects on scenic vistas would occur. As such, impacts under the No Project/No Build Alternative would be less than the Project.

(ii) Scenic Resources

The No Project/No Build Alternative would not change any conditions on the Project Site and would have no impact on scenic resources, such as the on-site

Capitol Records Building and the "Hollywood Jazz: 1945-1972" mural or the adjacent Hollywood Walk of Fame and street trees. Accordingly, because the No Project/No Build Alternative would not result in any changes to the Project Site, no effects on scenic resources would occur. As such, impacts under the No Project/No Build Alternative would be less than the Project.

(iii) Regulations Governing Scenic Quality

No development would occur under the No Project/No Build Alternative and, as such, no conflict with regulations that govern scenic quality would occur. Accordingly, because the No Project/No Build Alternative would not change any conditions at the Project Site, no impacts would occur. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant impact. Thus, impacts regarding conflicts with applicable zoning and other regulations governing scenic quality would be less under the No Project/No Build Alternative than the Project.

(iv) Light and Glare

Under the No Project/No Build Alternative, light sources on the Project Site would continue to consist of flood lights in the surface parking lots, the illuminated Capitol Records Building sign, and architectural and security lighting for the Capitol Records Complex. Accordingly, because the No Project/No Build Alternative would not introduce new sources of light and glare, no effects with respect to light and glare would occur. As such, impacts under the No Project/No Build Alternative would be less than the Project.

(b) Air Quality

Daily air quality construction emissions would be similar under the Project and the Project with the East Site Hotel Option. While the Project and the Project with the East Site Hotel Option would have nominally different daily operational emissions, the impact conclusions, significance levels, and mitigation are the same for the Project and the Project with the East Site Hotel Option. Accordingly, the below comparisons of impacts of the No Project/No Build Alternative apply to both the Project and the Project with the East Site Hotel Option.

(i) Conflict with Air Quality Management Plan

The No Project/No Build Alternative would not involve any new construction or change current activities on the Project Site. Since new development would not occur, the No Project/No Build Alternative would not generate new emissions or cause the Air Basin's criteria pollutant emissions to worsen so as to impede the objectives of the AQMP. Accordingly, because the No Project/No Build Alternative would not result in any new emissions generation, no air quality impacts would occur. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant impact. Thus, impacts with regard to conflicts with air quality

management plans would be less under the No Project/No Build Alternative than the Project.

(ii) Cumulative Increase in Criteria Pollutants/Violation of Air Quality Standards

(a) Construction

The No Project/No Build Alternative would not involve construction or generate any new criteria pollutants. Accordingly, because the No Project/No Build Alternative would not result in any new emissions generation, no air quality impacts would occur. As such, the No Project/No Build Alternative would avoid the Project's potential exceedance of daily NOx emissions above the applicable threshold during construction, which requires mitigation to reduce this potentially significant impact to a less-than-significant level. Thus, impacts with regard to air quality thresholds would be less under the No Project/No Build Alternative than the Project.

(b) Operation

The No Project/No Build Alternative would not result in any new emissions over existing conditions and would have no impact relative to threshold standards. As such, the No Project/No Build Alternative would avoid the Project's potential exceedance of daily NOx emissions above the applicable threshold during operation, which requires mitigation to reduce this potentially significant impact to a less-than-significant level. Thus, impacts with regard to air quality thresholds would be less under the No Project/No Build Alternative than the Project.

(iii) Exposure of Sensitive Receptors to Pollutant Concentrations

(a) Localized Emissions

The No Project/No Build Alternative would not involve any construction or increased activity at the Project Site compared to existing conditions. Accordingly, the No Project/No Build Alternative would not generate any localized emissions and is considered to have no impact related to localized emissions. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant impacts related to localized emissions. Thus, impacts with respect to localized emissions under the No Project/No Build Alternative would be less than the Project.

(b) Carbon Monoxide Hotspots

The No Project/No Build Alternative would not increase traffic or other activity at the Project Site compared to existing conditions. Accordingly, the No Project/No Build Alternative would not generate any emissions that would contribute to CO hotspots and is considered to have no impact related to CO hotspots. As such, the

No Project/No Build Alternative would avoid the Project's less-than-significant CO hotspots impacts. Thus, impacts with respect to CO hotspots under the No Project/No Build Alternative would be less than the Project.

(c) Toxic Air Contaminants

(i) Construction

The No Project/No Build Alternative would not involve any construction or new development at the Project Site compared to existing conditions. Accordingly, the No Project/No Build Alternative would not generate any TAC emissions during construction and is considered to have no impact related to TAC emissions. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant TAC emissions impacts (after mitigation). Thus, impacts with regard to TAC emissions would be less under the No Project/No Build Alternative than the Project.

(ii) Operation

The No Project/No Build Alternative would not involve any new or increased activity at the Project Site compared to existing conditions. Accordingly, the No Project/No Build Alternative would not generate any TAC emissions during operation and is considered to have no impact related to TAC emissions. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant TAC emissions impacts. Thus, impacts with regard to TAC emissions would be less under the No Project/No Build Alternative than the Project.

(iv) Other Emissions Affecting a Substantial Number of People

The No Project/No Build Alternative would not result in any new development that would require construction or change activities on the Project Site compared to existing conditions. Accordingly, the No Project/No Build Alternative would not generate any other emissions affecting a substantial number of people and is considered to have no impact related to other emissions. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant impacts. Thus, impacts with regard to other emissions would be less under the No Project/No Build Alternative than the Project.

(c) Cultural Resources

As cultural resources impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of the No Project/No Build Alternative apply to both the Project and the Project with the East Site Hotel Option.

(i) Historical Resources

The No Project/No Build Alternative would not change conditions on the Project Site. Therefore, it would not directly or indirectly affect existing historical resources impacted by the Project, including the Capitol Records Building, Gogerty Building, the Pantages Theatre, Avalon Hollywood, the building located at 6316-24 Yucca Street (Art Deco Storefront), and the Hollywood Walk of Fame. The No Project/No Build Alternative would have no impact to historical resources. As such, the No Project/No Build Alternative would avoid the Project's potentially significant and unavoidable temporary construction vibration and settlement effects on off-site historical resources. Thus, impacts to historical resources would be less under the No Project/No Build Alternative than the Project.

(ii) Archaeological Resources

The No Project/No Build Alternative would not require any excavation activities that would potentially encounter previously undiscovered archaeological resources. Accordingly, because the No Project/No Build Alternative would involve no excavation or ground disturbance, it would have no impact on archaeological resources. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant impacts (after mitigation) related to an adverse change in the significance of an archaeological resource. Thus, impacts related to archaeological resources would be less under the No Project/No Build Alternative than the Project.

(iii) Human Remains

The No Project/No Build Alternative would involve no construction or excavation, and, therefore, it would have no potential to encounter human remains. Accordingly, because the No Project/No Build Alternative would involve no excavation or ground disturbance, it would have no impact on human remains. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant impacts on human remains. Thus, impacts related to human remains would be less under the No Project/No Build Alternative than the Project.

(d) Geology and Soils

As geology and soils impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of the No Project/No Build Alternative apply to both the Project and the Project with the East Site Hotel Option.

(i) Seismic Hazards

The No Project/No Build Alternative would not require any new development at the Project Site or increase or change exposure to existing environmental conditions, such as fault rupture, seismic shaking, liquefaction, or other geologic hazards. Accordingly, because the No Project/No Build Alternative would not require any new development or earthwork, it would not change the existing exposure to

geologic conditions and no impacts would occur. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant impacts regarding seismic hazards. Thus, impacts related to seismic hazards would be less under the No Project/No Build Alternative than the Project.

(ii) Soil Erosion or Loss of Topsoil

The No Project/No Build Alternative would not require any new construction activity or exposure of soils due to construction. Accordingly, because the No Project/No Build Alternative would not involve any construction activity or earthwork, it would not cause the potential exposure of soil or loss of topsoil, and no impacts would occur. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant impacts regarding soil erosion or loss of topsoil. Thus, impacts related to soil erosion or loss of topsoil would be less under the No Project/No Build Alternative than the Project.

(iii) Unstable Geologic Units

The No Project/No Build Alternative would not include any new development that would expose more people or structures to unstable geologic units, such as localized raveling or caving of excavated areas. Accordingly, because the No Project/No Build Alternative would not involve any new structures or excavation activity, it would not expose people or structures to unstable geologic units, and no impacts would occur. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant impacts regarding unstable geologic units. Thus, impacts related to unstable geologic units would be less under the No Project/No Build Alternative than the Project.

(iv) Expansive Soils

The No Project/No Build Alternative would not include any new development that would expose more people or structures to geologic hazards, such as expansive soils. Accordingly, because the No Project/No Build Alternative would not involve any new structures on the Project Site, it would not expose people or structures to geologic hazards, such as expansive soils, and no impacts would occur. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant impacts regarding expansive soils. Thus, impacts related to expansive soils would be less under the No Project/No Build Alternative than the Project.

(v) Paleontological Resources

The No Project/No Build Alternative would not require any construction activities; therefore, it would have no potential to encounter previously undiscovered paleontological resources. Accordingly, because the No Project/No Build Alternative would involve no excavation or ground disturbance, it would have no impact on paleontological resources. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant impacts (after mitigation) related to directly or indirectly destroying paleontological resources. Thus, impacts related to

paleontological resources would be less under the No Project/No Build Alternative than the Project.

(e) Greenhouse Gas Emissions

The No Project/No Build Alternative would not include construction of any new buildings, higher occupancy of the Project Site, or other activity that would generate new GHG emissions. Accordingly, because the No Project/No Build Alternative would not involve new construction or a change in GHG emission-producing activity over existing conditions, it would result in no GHG emission impacts, and no impacts regarding conflicts with applicable plans, policies, or regulations adopted for the purpose of reducing GHGs would occur. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant impacts regarding GHG emissions and conflicts with applicable plans, policies, or regulations adopted for the purpose of reducing GHGs. Thus, impacts related to GHGs would be less under the No Project/No Build Alternative than the Project.

(f) Hazards and Hazardous Materials

As impacts related to hazards and hazardous materials would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of the No Project/No Build Alternative apply to both the Project and the Project with the East Site Hotel Option.

(i) Hazard to the Public or the Environment through the Routine Transport, Use, or Disposal of Hazardous Materials

The No Project/No Build Alternative would not involve any changes in existing conditions or the use, transport, or disposal of hazardous materials. Accordingly, because the No Project/No Build Alternative would not involve new construction or changes in site activity over existing conditions, it would result in no impacts regarding potential hazards to the public or the environment through the routing transport, use, or disposal of hazardous materials. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant hazardous materials impacts. Thus, impacts related to hazardous materials would be less under the No Project/No Build Alternative than the Project.

(ii) Hazard to the Public or Environment Involving the Accidental Release of Hazardous Materials into the Environment

The No Project/No Build Alternative would not involve construction or alter existing activities on the Project Site; therefore, it would not change the potential for an accidental release of hazardous materials into the environment compared to existing conditions. Accordingly, because the No Project/No Build Alternative would not involve new construction, activity, or uses that would create a hazard to the public involving the accidental release of hazardous materials into the

environment, it would have no impact related to this hazard. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant hazardous materials release impacts (after mitigation), including those related to contaminated soils or soil vapors. Thus, impacts related to hazardous materials release would be less under the No Project/No Build Alternative than the Project.

(iii) Hazards Resulting from Hazardous or Acutely Hazardous Materials, Substances, or Waste within One-Quarter Mile of a School

The No Project/No Build Alternative would not involve construction or alter existing activities on the Project Site, which could involve hazardous materials or emissions near a school. Accordingly, because the No Project/No Build Alternative would not require the use of hazardous materials or involve hazardous emissions, it would have no impact related to this hazard. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant impact related to hazardous materials or hazardous emission near a school. Thus, impacts related to the release of hazardous materials or emissions near a school would be less under the No Project/No Build Alternative than the Project.

(iv) Hazards Materials Sites

The No Project/No Build Alternative would not involve construction or alter existing activities on a hazardous materials site compiled pursuant to Government Code Section 65962.5. Accordingly, the No Project/No Build Alternative would have no impact with regard to development occurring on a hazardous materials site. The Project would also not be located on a hazardous materials site and it too would result in no impacts. Thus, impacts related to development on a hazardous materials site would be similar under the No Project/No Build Alternative and the Project.

(v) Emergency Response Plan/Emergency Evacuation Plan

The No Project/No Build Alternative would not require any new construction activities or occupancy of the Project Site that would affect an existing Emergency Operations Plan or the City's established disaster routes. Accordingly, because the No Project/No Build Alternative would not involve any new development, traffic, potential evacuation activity, it would not change existing conditions or affect the implementation of the City's emergency response or evacuation plans, and no impacts would occur. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant impact related to emergency response and evacuation plans. Thus, impacts related to emergency response and evacuation plans would be less under the No Project/No Build Alternative than the Project.

(g) Hydrology and Water Quality

As hydrology and water quality impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of the No Project/No Build Alternative apply to both the Project and the Project with the East Site Hotel Option.

(i) Water Quality

(a) Construction

The No Project/No Build Alternative would not involve any construction and, as such, would not cause surface or groundwater exposure to pollutants during construction that would violate water quality or waste discharge standards. Accordingly, because the No Project/No Build Alternative would not involve any construction, it would have no impact on surface or groundwater quality. As such, it would avoid the Project's less-than-significant impact related to water quality standards during construction. Thus, impacts related to water quality during construction would be less under the No Project/No Build Alternative than the Project.

(b) Operation

The existing Project Site was developed prior to the enforcement of storm water quality BMP design, implementation, and maintenance. The Project Site currently does not implement BMPs and has no means for treatment of stormwater runoff. Unlike the Project, the No Project/No Build Alternative would not include water treatment features and BMPs in accordance with current regulations that improve the quality of stormwater runoff. As such, because these beneficial improvements would not occur under the No Project/No Build Alternative, impacts related to water quality during operation would be greater under the No Project/No Build Alternative than the Project's less-than-significant impacts.

(ii) Decreases in Groundwater Supplies or Recharge

The No Project/No Build Alternative would result in no changes to the Project Site and, as such, would have no impact on groundwater supplies or recharge. Accordingly, because the No Project/No Build Alternative would not involve any construction, it would have no impact on groundwater supplies or recharge. As such, it would avoid the Project's less-than-significant impact related to dewatering during construction and percolation and infiltration during operation. Thus, impacts related to groundwater supplies or recharge would be less under the No Project/No Build Alternative than the Project.

(iii) Alteration of Drainage Pattern

(a) Construction

The No Project/No Build Alternative would not involve any construction and, as such, would not alter existing surface runoff or drainage patterns resulting in on- or off-site erosion, siltation or flooding; increased rate or flow in surface runoff; or the exceedance of the capacity of the area's drainage system. Accordingly, the No Project/No Build Alternative would have no impact with respect to drainage patterns, siltation, erosion, and surface runoff. As such, it would avoid the Project's less-than-significant impact related to drainage patterns, siltation, erosion, and surface runoff during construction. Thus, impacts related to drainage patterns, siltation, erosion, and surface runoff during construction would be less under the No Project/No Build Alternative than the Project.

(b) Operation

The No Project/No Build Alternative would not change the Project Site's existing surface runoff conditions, which generally consist of impervious surface parking, buildings, and pavement for pedestrian and vehicular circulation. Accordingly, because the No Project/No Build Alternative would not involve any construction, it would have no impact related to drainage patterns, siltation, erosion, and surface runoff. However, unlike the Project, beneficial impacts related to improving the quality of stormwater runoff as a result of the implementation of water treatment features and BMPs in accordance with current regulations would not occur under the No Project/No Build Alternative. As such, because these beneficial improvements would not occur under the No Project/No Build Alternative, impacts related to drainage patterns, siltation, erosion, and surface runoff during operation would be greater under the No Project/No Build Alternative than the Project's less-than-significant impacts.

(iv) Pollutant Release in Flood Hazard, Tsunami, or Seiche Zones

The No Project/No Build Alternative would not involve any construction and, as such, would not alter pollutants already occurring on the Project Site. Accordingly, this alternative would have no impact with respect to risks associated with the potential release of pollutants due to flooding, tsunami, or seiche. The existing Project Site was developed prior to the enforcement of storm water quality BMP design, implementation, and maintenance. The Project Site currently does not implement BMPs and has no means for treatment of stormwater runoff. Unlike the Project, the No Project/No Build Alternative would not include water treatment features and BMPs in accordance with current regulations that improve the quality of stormwater runoff. As such, because these beneficial improvements would not occur under the No Project/No Build Alternative, impacts related to risk of pollutant release due to on-site flooding or inundation would be greater under the No Project/No Build Alternative than the Project's less-than-significant impacts.

(v) Implementation of Water Quality Control Plans

The No Project/No Build Alternative would not cause any changes in existing conditions or result in any new development of the Project Site. Accordingly, this alternative would have no bearing on the implementation of water quality control plans, the policies of which are expressed in City and State water quality regulations for the protection of water resources. As such, it would avoid the Project's less-than-significant impact related to conflicts with or obstructing implementation of a water quality control plan or sustainable groundwater management plan. Thus, impacts related to water quality control plans or sustainable groundwater management plans would be less under the No Project/No Build Alternative than the Project.

(h) Land Use and Planning

As land use impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of the No Project/No Build Alternative apply to both the Project and the Project with the East Site Hotel Option. The No Project/No Build Alternative would not change the existing land use and occupancy of the Project Site. The existing parking lots, commercial uses, and zoning designations would remain. As no changes would occur on the Project Site, the No Project/No Build Alternative would not conflict with any adopted plans, policies or regulations related to avoiding or reducing environmental impacts. Although the No Project/No Build Alternative would not further regional and local policies applicable to the Project Site with the City of Los Angeles, such as enhancing pedestrian activity or increasing transit use, it would have no impacts with respect to conflicts with plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. As such, it would avoid the Project's less-than-significant impact with respect to conflicts with adopted land plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Thus, impacts related to conflicts with land use plans, policies and regulations adopted for the purpose of avoiding or mitigating an environmental effect would be less under the No Project/No Build Alternative than the Project.

(i) Noise

Maximum daily construction noise and vibration levels would be similar under the Project and the Project with the East Site Hotel Option. While the Project and the Project with the East Site Hotel Option would have nominally different daily operational mobile source noise levels, the impact conclusions, significance levels, and mitigation measures are the same for the Project and the Project with the East Site Hotel Option. Accordingly, the below comparisons of impacts of the No Project/No Build Alternative apply to both the Project and the Project with the East Site Hotel Option.

(i) Noise Levels in Excess of Standards

(a) Construction

The No Project/No Build Alternative would not involve any construction activities, and, therefore, no construction noise impacts would occur. As such, the No Project/No Build Alternative would avoid the Project's significant and unavoidable noise impacts at nearby noise sensitive receptor locations during Project construction. Thus, impacts related to construction noise would be less under the No Project/No Build Alternative than the Project.

(b) Operation

Occupancy and activity at the Project Site would not change under the No Project/No Build Alternative, and no new operational noise impacts would occur. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant operational noise impacts at nearby noise sensitive receptor locations. Thus, impacts related to operational noise would be less under the No Project/No Build Alternative than the Project.

(ii) Groundborne Noise and Vibration

(a) Construction

The No Project/No Build Alternative would not involve any new development or construction, and, therefore, no construction vibration impacts would occur. As such, the No Project/No Build Alternative would avoid the Project's potentially significant and unavoidable structural vibration impacts to nearby buildings, as well as human annoyance impacts to nearby vibration sensitive receptor locations. Thus, impacts related to construction vibration would be less under the No Project/No Build Alternative than the Project.

(iii) Operation

Occupancy and activity at the Project Site would not change under the No Project/No Build Alternative, and, therefore, no vibration impacts would occur. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant operational vibration impacts to nearby vibration sensitive receptors. Thus, impacts related to operational vibration would be less under the No Project/No Build Alternative than the Project.

(j) Population and Housing

During operation, the Project and the Project with the East Site Hotel Option would have different population, housing, and employment generation statistics. However, both development scenarios would result in the same impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of the No Project/No Build Alternative apply to both the Project and the Project with the East Site Hotel Option.

The No Project/No Build Alternative would not generate any changes on the Project Site and, as such, would not induce unplanned population growth. Accordingly, no impacts would occur. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant population, employment, and housing impacts. However, it should be noted that the No Project/No Build Alternative would not advance local and regional planning objectives that promote infill development that support and provide a mix of uses in urban centers near public transit. Also, the No Project/No Build Alternative would not assist the City in meeting its housing obligation under SCAG's RHNA allocation. Specifically, the Project Site would remain as mostly surface parking with limited commercial use. Nonetheless, because no impacts would occur, impacts related to population, housing and employment would be less under the No Project/No Build Alternative than the Project.

(k) Public Services

During operation, the Project and the Project with the East Site Hotel Option would have different service-related population statistics, such as number of residents or students. However, both development scenarios would result in the same impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of the No Project/No Build Alternative apply to both the Project and the Project with the East Site Hotel Option.

(i) Fire Protection

The No Project/No Build Alternative would not cause any changes in activity or occupancy of the Project Site that would increase demand or otherwise affect fire protection services. Accordingly, because the No Project/No Build Alternative would not result in a population gain that would increase demand, it would have no impact related to fire protection services. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant impact related to fire protection services. Thus, impacts related to fire protection services would be less under the No Project/No Build Alternative than the Project.

(ii) Police Protection

The No Project/No Build Alternative would not cause any changes in activity or occupancy of the Project Site that would increase demand or otherwise affect police protection services. Accordingly, because the No Project/No Build Alternative would not result in a population gain that would increase demand, it would have no impact related to police protection services. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant impact related to police protection services. Thus, impacts related to police protection services would be less under the No Project/No Build Alternative than the Project.

(iii) Schools

The No Project/No Build Alternative would not generate school-aged children through the development of new residential units or employment opportunities at the Project Site. Thus, there would be no change in the demand for education services at schools serving the Project Site. Accordingly, because the No Project/No Build Alternative would not result in a population that would increase the need for school services, it would have no impact on schools. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant impact related to schools. Thus, impacts related to schools would be less under the No Project/No Build Alternative than the Project.

(iv) Parks and Recreation

The No Project/No Build Alternative would not change the current occupancy and use of the Project Site; therefore, it would not increase demand for parks and recreation services. Accordingly, since the No Project/No Build Alternative would not directly or indirectly result in a population gain that would generate demand for parks and recreation services, it would have no impact on parks and recreational facilities. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant impact related to parks and recreation facilities. Thus, impacts related to parks and recreational facilities would be less under the No Project/No Build Alternative than the Project.

(v) Libraries

The No Project/No Build Alternative would not result in an increase in residential or employee population and, therefore, would not increase demand for library services. Accordingly, because the No Project/No Build Alternative would not result in a population gain that would generate an increase in demand for library services, it would have no impact with respect to library services. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant impact related to libraries. Thus, impacts related to libraries would be less under the No Project/No Build Alternative than the Project.

(l) Transportation

During operation, the Project and the Project with the East Site Hotel Option would have different overall VMT and VMT per capita statistics. However, both development scenarios would result in the same transportation-related impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of the No Project/No Build Alternative apply to both the Project and the Project with the East Site Hotel Option.

(i) Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities

The No Project/No Build Alternative would not involve any new development and, as such, would not conflict with any programs, plans, ordinances or policies addressing the circulation system, transit, roadways, bicycle and pedestrian facilities, including those of Mobility Plan 2035, the City of Los Angeles Complete Streets Design Guide, Hollywood Community Plan, and Hollywood Redevelopment Plan. Accordingly, the No Project/No Build Alternative would neither implement nor conflict with any such programs, plans, ordinances, or policies, and, as such, no impact would occur. Therefore, the No Project/No Build Alternative would avoid the Project's less-than-significant impact related to such potential conflicts. Thus, impacts related to potential conflicts with any such programs, plans, ordinances, or policies would be less under the No Project/No Build Alternative than the Project.

(ii) Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)

The No Project/No Build Alternative would not result in an increase in the intensity of on-site development and, thus, would result in no additional VMT over existing conditions. Accordingly, because the No Project/No Build Alternative would not result in any new VMT over existing conditions, it would have no impact with respect to consistency with CEQA Guidelines Section 15064.3(b). As such, the No Project/No Build Alternative would avoid the Project's less-than-significant impact related to VMT. Thus, impacts related to VMT would be less under the No Project/No Build Alternative than the Project.

(iii) Design Hazards

The No Project/No Build Alternative would not involve any new development and, thus, would not include new sidewalks, driveways, or roadway improvements in and around the Project Site. Therefore, no design hazards impacts would occur under the No Project/No Build Alternative. Unlike the Project, the No Project/No Build Alternative would not reduce existing curb cuts, provide a wide, landscaped paseo extending east-west through the Project Site, as well as a signalized mid-block crosswalk across Argyle Avenue to help facilitate local pedestrian circulation and access by maintaining a path of east-west travel with the existing mid-block crosswalks across Ivar Avenue and Vine Street. Furthermore, driveway crossings along Vine Street and the Hollywood Walk of Fame would not be eliminated under the No Project/No Build Alternative to provide a continuous pedestrian access to reduce vehicle/pedestrian conflicts. As no new improved design features would occur with respect to existing pedestrian/vehicle conflicts under the No Project/No Build Alternative, it would have a greater impact related to design hazards than the Project.

(iv) Emergency Access

The No Project/No Build Alternative would not change any existing conditions that would affect emergency access. Accordingly, because the No Project/No Build Alternative would not cause any changes resulting in inadequate emergency access, it would have no impact regarding emergency access. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant impact related to emergency access. Thus, impacts related to emergency access would be less under the No Project/No Build Alternative than the Project.

(m) Tribal Cultural Resources

As tribal cultural resources impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparison of impacts of the No Project/No Build Alternative apply to both the Project and the Project with the East Site Hotel Option.

The No Project/No Build Alternative would not require any construction activities; therefore, it would have no potential to encounter tribal cultural resources. Accordingly, because the No Project/No Build Alternative would involve no excavation or ground disturbance or change in use of the Project Site, it would have no impact related to tribal cultural resources. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant impacts related to tribal cultural resources. Thus, impacts related to tribal cultural resources would be less under the No Project/No Build Alternative than the Project.

(n) Utilities and Service Systems – Water, Wastewater, and Solid Waste

During operation, the Project and the Project with the East Site Hotel Option would have different utility demand statistics (i.e., water demand, wastewater generation, and solid waste generation). However, both development scenarios would result in the same impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of the No Project/No Build Alternative apply to both the Project and the Project with the East Site Hotel Option.

(o) Wastewater

The No Project/No Build Alternative would not construct new buildings or add population to the Project Site; therefore, wastewater generation would not change compared to existing conditions on the Project Site. The No Project/No Build Alternative would not generate additional wastewater or increase demand on the existing Hyperion Treatment Conveyance System or Hyperion Treatment Plant. Accordingly, because no new demand would occur under the No Project/No Build Alternative, it would have no impact on wastewater service systems. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant wastewater impacts. Thus, impacts with regard to wastewater would be less under the No Project/No Build Alternative than the Project.

(p) Water Supply

The No Project/No Build Alternative would not construct new buildings or add population to the Project Site; therefore, water demand would not change compared to existing conditions on the Project Site. Accordingly, because no new water demand would occur under the No Project/No Build Alternative, it would have no impact on water supply or infrastructure. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant water supply and infrastructure impacts. Thus, impacts with regard to water supply and infrastructure would be less under the No Project/No Build Alternative than the Project.

(q) Solid Waste

The No Project/No Build Alternative would not construct new buildings or add population to the Project Site; therefore, solid waste generation would not change compared to existing conditions on the Project Site. Accordingly, because no demolition, construction, or operation of additional uses would occur under the No Project/No Build Alternative, it would have no impact relative to solid waste. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant solid waste impacts. Thus, impacts with regard to solid waste would be less under the No Project/No Build Alternative than the Project.

(r) Energy Conservation and Infrastructure

During operation, the Project and the Project with the East Site Hotel Option would have different energy consumption statistics. However, both development scenarios would result in the same impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of the No Project/No Build Alternative apply to both the Project and the Project with the East Site Hotel Option.

(i) Efficient Energy Consumption

The No Project/No Build Alternative would not involve any changes on the Project Site that would generate an increase in demand for energy compared to existing conditions. Accordingly, because the No Project/No Build Alterative would not involve any new development or increase energy use, it would have no impact regarding efficient energy consumption. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant energy consumption impacts. Thus, impacts with regard to energy consumption would be less under the No Project/No Build Alternative than the Project.

(ii) Conflict with Plans for Renewable Energy or Energy Efficiency

The No Project/No Build Alternative would not be subject to review pursuant to plans for renewable energy and energy efficiency, and, therefore, no impact regarding conflict with such plans would occur. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant impacts with respect to conflicts with plans for renewable energy or energy efficiency. Thus, impacts with

respect to conflicts with plans for renewable energy or energy efficiency would be less under the No Project/No Build Alternative than the Project.

(iii) Relocation or Expansion of Energy Infrastructure

The No Project/No Build Alternative would not change existing conditions or generate additional demand on existing energy infrastructure. Accordingly, because the No Project/No Build Alternative would not increase energy demand, it would have no impact on energy infrastructure. As such, the No Project/No Build Alternative would avoid the Project's less-than-significant energy infrastructure impacts. Thus, impacts with regard to energy infrastructure would be less under the No Project/No Build Alternative than the Project.

(3) Relationship of the Alternative to Project Objectives

As described above, the No Project/No Build Alternative assumes that no new development would occur on the Project Site. The on-site uses would continue to operate similar to existing conditions. As the No Project/No Build Alternative would not include a development program, it would not contribute to growth and development within the Hollywood Community, and, therefore, it would not achieve any of the Project Objectives. The relationship of the No Project/No Build Alternative to the Project Objectives is presented in **Table V-16**, *Ability of Alternatives to Meet Project Objectives*, at the end of this Chapter.

b) Alternative 2: Development Under Existing Zoning

(1) Description of the Alternative

The Development Under Existing Zoning Alternative (Alternative 2) would conform to the Project Site's existing zoning designation. The development of Alternative 2 with a mix of residential, retail, and restaurant uses would be similar to the Project, although residential uses would be proportionally reduced to reflect the reduction in FAR from 6.973:1 over the Project Site under the Project to 3:1, except for a small section in the northwest corner of the West Site, which would be developed to an FAR of 2:1. Alternative 2 would be developed with a total of 30,176 square feet of retail and restaurant uses, which is the same as the floor area of retail and restaurant uses provided by the Project. Alternative 2 would include approximately 36,141 square feet of publicly accessible open space at the ground level, which would form a paseo through the Project Site. No performance stage would be located within the paseo off of Vine Street on the East Site. Alternative 2 would provide a total of 384 market-rate residential units and no senior affordable units.

As shown in **Figure V-1**, *Building Massing for Alternative 2*, Alternative 2's residential component would be provided within two high-rise buildings, one each on the East Site and West Site, respectively. Each building would provide 192 market-rate residential units. The East Building would be 18 stories and reach a height of 243 feet at the top of the 18th story and 293 feet at the top of the bulkhead. The West Building would be 14 stories and reach a height of 195 feet at the top of the 14th story and 235 feet at the top of the bulkhead. The senior affordable buildings would not be constructed under Alternative 2 as this is zoning compliant alternative does not trigger Measure JJJ. A three-level subterranean parking structure containing 300 spaces would be provided on the East Site, and a two-level subterranean parking structure containing 193 parking spaces would be provided on the West Site, for a total of 493 parking spaces. Vehicle and bicycle parking would be provided in accordance with LAMC requirements. The total floor area for Alternative 2 would be approximately 480,516 square feet, which would result in an FAR of 2.96:1, and represent an approximately 62.7-percent reduction in the Project's total floor area and a 62.3-percent reduction compared to the Project with the East Site Hotel Option.[7] **Figure V-2**, *Alternative 2 Ground Floor Plan*, illustrates the uses and open space at the ground level, and **Figure V-3**, *Alternative 2 Building Footprints*, illustrates the location of proposed residential buildings relative to the proposed ground level uses. The components of Alternative 2 are compared to those of the Project in **Table V-2**, *Comparison of Alternative 2 to the Project*.

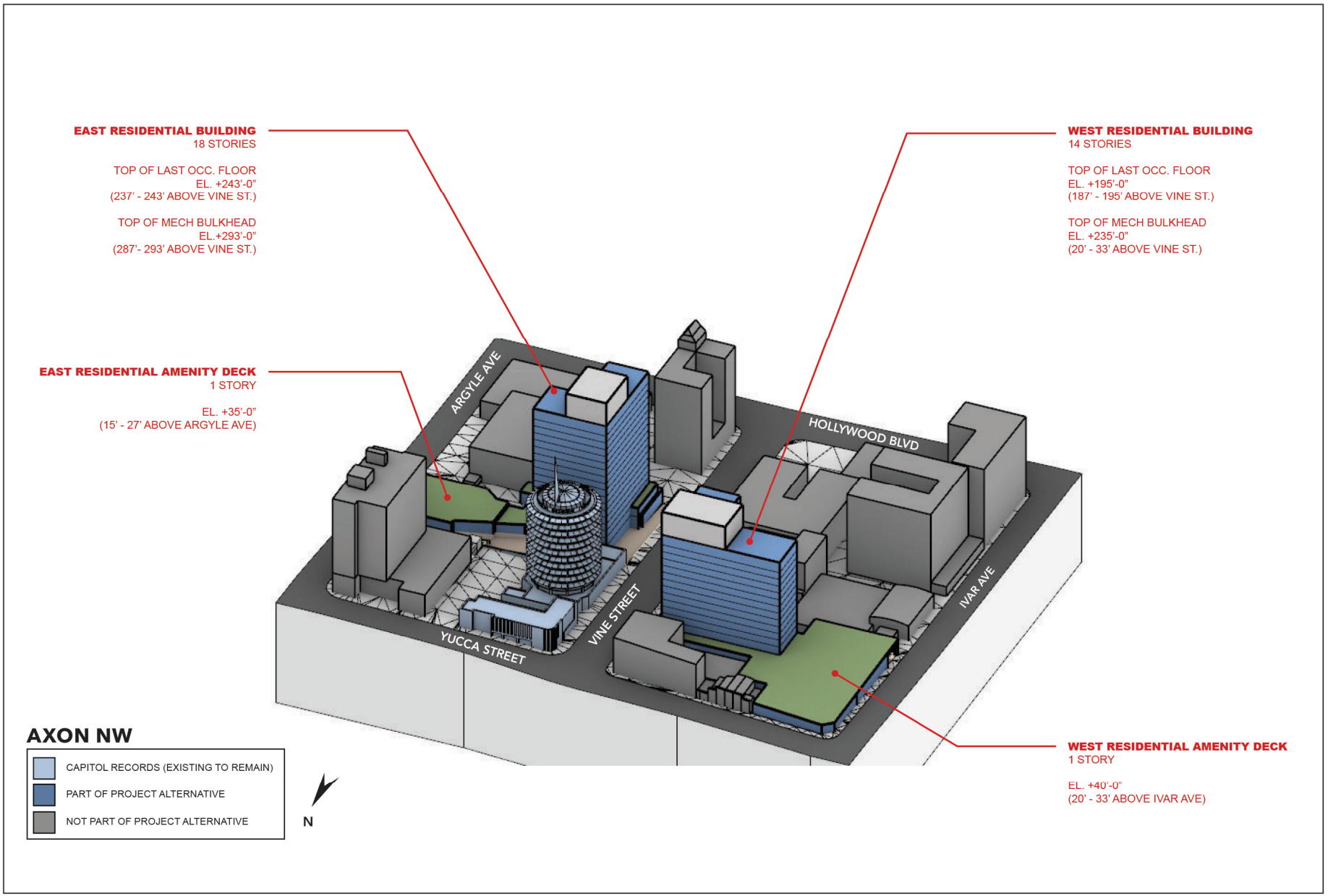
(2) Environmental Impacts

(a) Aesthetics

SB 743 (codified in PRC Section 21099(d)(1)) and ZI File No. 2452 provide that a mixed-use project in a designated urban TPA site is not required to evaluate physical aesthetic impacts pertaining to scenic vistas, scenic resources, and light and glare in an EIR. Although the Project and this Alternative meet these criteria, for disclosure purposes only, information based on City thresholds is provided relative to scenic vistas, scenic resources, and light and glare.

As aesthetics impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 2 apply to both the Project and the Project with the East Site Hotel Option.

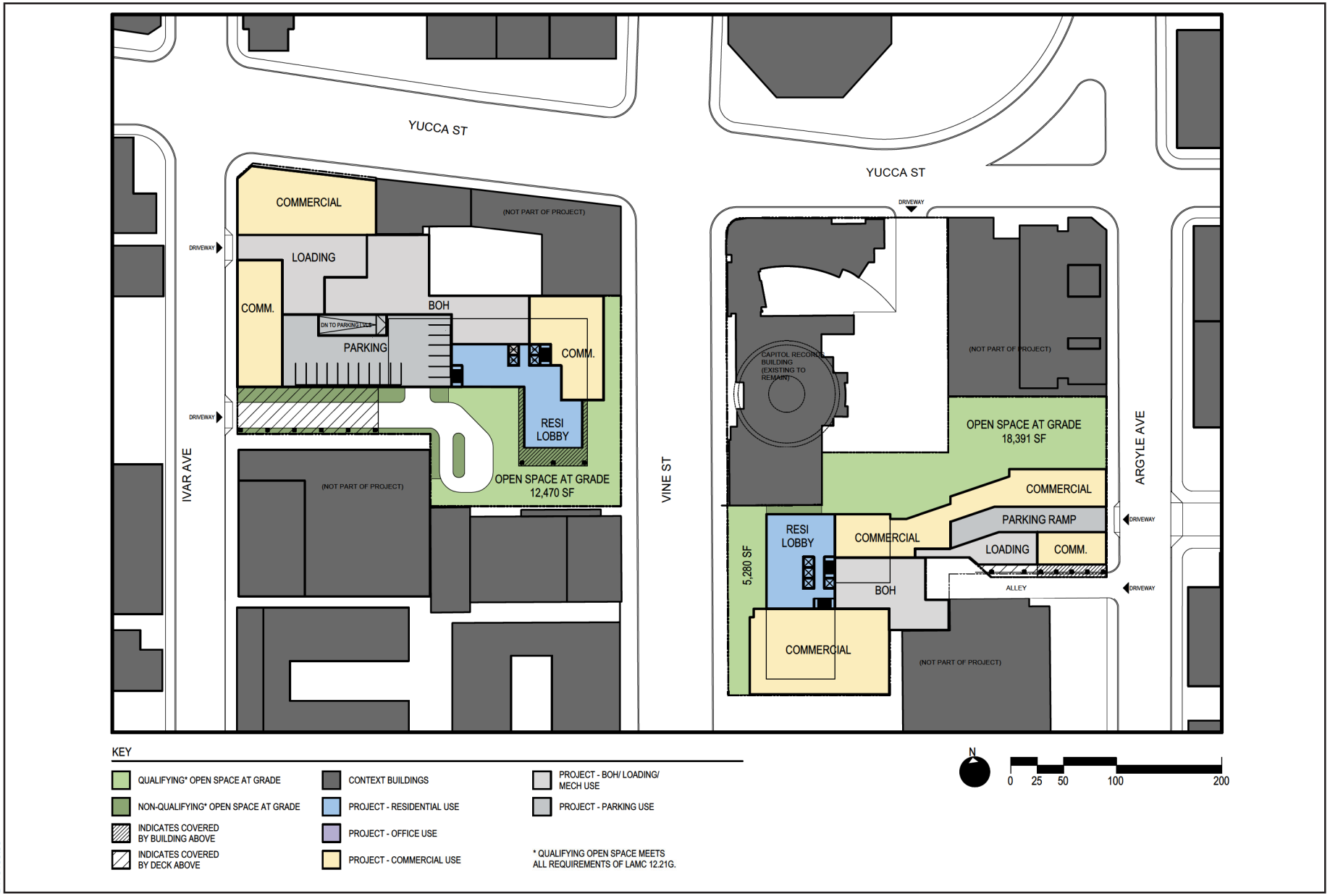
7 The average FAR for Alternative 2 is based on the combined allowance of 3:1 FAR on the majority of the Project Site, and 2:1 FAR on a small section in the northwest corner of the Project Site.



SOURCE: Handel Architects, 2019

Hollywood Center Project

Figure V-1
Building Massing for Alternative 2

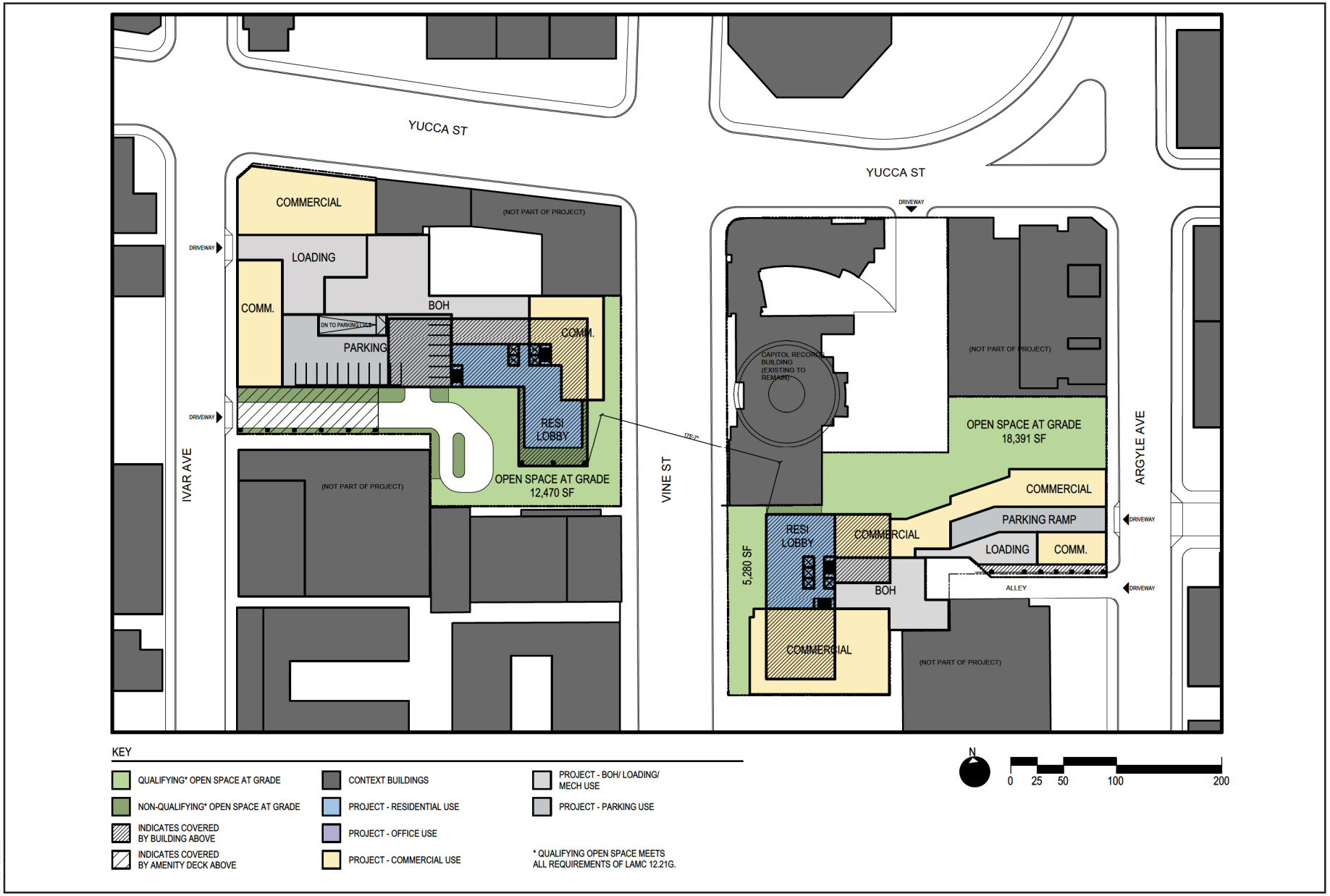


D170105.00

SOURCE: Handel Architects, 2020

Hollywood Center Project

Figure V-2
Alternative 2 Ground Floor Plan



D170105.00

SOURCE: Handel Architects, 2020

Hollywood Center Project

Figure V-3
Alternative 2 Building Footprints

TABLE V-2
COMPARISON OF ALTERNATIVE 2 TO THE PROJECT

Component	Project	Project With the East Site Hotel Option	Alternative 2
Publicly Accessible Open Space	33,922 sf	33,922 sf	36,141 sf
East Site	24,990 sf	24,990 sf	23,671 sf
West Site	8,932 sf	8,932 sf	12,470 sf
Maximum Building Height (including bulkhead)			
East Site	46 stories, 595 feet	46 stories, 595 feet	18 stories, 293 feet
West Site	35 stories, 469 feet	35 stories, 469 feet	14 stories, 235 feet
Market-Rate Units Total	872 du	768 du	384 du
East Site	423 du	319 du	192 du
West Site	449 du	449 du	192 du
Senior Affordable Units	133 du	116 du	0
East Site	65 du	48 du	0
West Site	68 du	68 du	0
Maximum Building Height Senior Buildings			
East Site	11 stories, 149 feet	9 stories, 131 feet	N/A
West Site	11 stories, 155 feet	11 stories, 155 feet	N/A
Hotel	N/A	220 rooms	N/A
Retail and Restaurant Floor Area Total	30,176 sf	30,176 sf	30,176 sf
East Site	17,485 sf	17,485 sf	17,485 sf
West Site	12,691 sf	12,691 sf	12,691 sf
Total New Floor Area	1,287,150 sf	1,277,741 sf	480,516 sf
East Site	638,407 sf	623,997 sf	233,275 sf
West Site	648,743 sf	648,744 sf	247,241 sf
Vehicle Parking	1,521 spaces	1,521 spaces	493 spaces
East Site	684 spaces	684 spaces	300 spaces
West Site	837 spaces	837 spaces	193 spaces
FAR[a]	6.973:1	6.901:1	2.96:1

[a] The calculated FAR includes new floor area in addition to the floor area of the Capitol Records and Gogerty Buildings (114,303 sf).

SOURCE: ESA, 2020.

(i) Scenic Vistas

Alternative 2 would involve the construction of two new mixed-use high-rise buildings in accordance with current zoning designations. Buildings include a 14-story West Building rising 235 feet at the top of the bulkhead on the West Site and an 18-story East Building rising to 293 feet at the top of the bulkhead on the East Site. Construction and operation of Alternative 2 would affect public views across the existing surface parking lots and views of scenic elements within the Project Site. As with the Project, construction activities would require a construction fence which will be erected along the periphery of the Project Site, including Vine Street (required under Project Design Feature AES-PDF-1), which would temporarily block views of the "Hollywood Jazz: 1945-1972" mural. Construction activities would require the temporary removal of a portion of the adjacent Hollywood Walk of Fame. However, construction would be temporary and would not have a permanent substantial adverse effect on views of these resources. As with the Project, the West Site's 14-story building would block some passing views of the historic Knickerbocker sign from the Hollywood Freeway. However, similar to the Project, because of the continuous movement of traffic and availability of other freeway views to the sign, the effect on this freeway view is not considered a substantial adverse effect of Alternative 2. There are no existing significant panoramic views across the Project Site of the historic Hollywood Sign from adjacent streets or other public areas. Public views of broader scenic resources, such as the mountains and the Hollywood Sign through other street corridors, would continue to be available and would not be affected by construction or operation of Alternative 2. As with the Project, Alternative 2 would block some intermittent views of the historic Capitol Records Building from sections of Ivar Avenue, Hollywood Boulevard, and Argyle Avenue. During construction and operation of Alternative 2, as with the Project, the Capitol Records Building would continue to be visible from more prominent view locations, such as the Hollywood Hills and the intersection of Hollywood Boulevard and Vine Street, or other sections along local streets. As with the Project, Alternative 2 would provide viewing opportunities of the Capitol Records Building from a new public paseo through the East Site and a plaza accessible from Vine Street on the West Site. As the East Senior Building would not be constructed, a broader view of the Capitol Records Building would be available through the paseo from Argyle Avenue than under the Project. As with the Project, the East Building would be set back from Vine Street to allow views of the Capitol Records Building from Hollywood Boulevard and Vine Street. Although neither Alternative 2 nor the Project would have a substantial adverse effect on scenic vistas, Alternative 2 would result in a shorter duration of construction and blocked views of the mural or the removal of the Hollywood Walk of Fame and allow for broader views of the Capitol Records Building through the paseo from Argyle Avenue. Therefore, when compared to the Project, the effects on scenic vistas under Alternative 2 would be less due to Alternative 2's reduction in building heights and provision of a broader view of the Capitol Records Building through the paseo.

(ii) Scenic Resources

Impacts to on-site scenic resources, such as the on-site Capitol Records Building, the "Hollywood Jazz: 1945-1972" mural, the adjacent Hollywood Walk of Fame, and existing street trees, under Alternative 2 would be the same as the Project. Similar to the Project, construction vehicles and other construction activity on or adjacent to the Vine Street sidewalk under Alternative 2 would potentially impact the Hollywood Walk of Fame. However, as with the Project, implementation of Mitigation Measure CUL-MM-1 would ensure protection and temporary removal of the bronze and terrazzo Hollywood Walk of Fame stars and reduce impacts to less-than-significant. As with the Project, Alternative 2 would replace removed street trees with similar species and plant additional trees within the Project Site's open space areas, including the paseo, in accordance with the requirements of the LAMC and the City's Urban Forestry Division's requirements (currently requiring street tree replacement on a 2:1 basis). In addition, similar to the Project, Alternative 2 would preserve the "Hollywood Jazz: 1945-1972" mural. Overall, similar to the Project, Alternative 2 would not substantially damage scenic resources. As with the Project, Alternative 2 would implement measures to ensure the Hollywood Walk of Fame is protected and that no physical changes to nearby scenic resources or historic buildings would occur. Therefore, when compared to the Project, the effects on scenic resources under Alternative 2 would be similar to the Project.

(iii) Regulations Governing Scenic Quality

CEQA Appendix G addresses whether a project in an urban area would conflict with regulations that govern scenic quality, such as those applicable to street trees, exterior lighting, signage, and compliance with applicable policies of the General Plan or Community Plan. As with the Project, Alternative 2 would replace street trees and provide exterior lighting in compliance with LAMC regulations and would comply with signage regulations set forth under the Hollywood Signage Supplemental Use District (HSSUD). In addition, similar to the Project, Alternative 2 would not conflict with Objective 7 of the Hollywood Community Plan, which requires the preservation of open space and promotes the preservation of views, natural character and topography of mountainous parts of the Hollywood community. The Project Site is visible from the Mulholland Scenic Parkway's Hollywood Bowl Overlook, an area with broad open space views in the Hollywood Hills. As with the Project, Alternative 2 would not adversely affect views from this open space area and, as such, would be consistent with Objective 7 of the Community Plan to preserve views. Therefore, similar to the Project, Alternative 2 would not conflict with the LAMC, HSSUD, or the applicable Community Plan open space policy. As with the Project, impacts under Alternative 2 would be less than significant. As Alternative 2 would also comply with regulations governing scenic quality, impacts under Alternative 2 would be similar to the Project.

(iv) Light and Glare

As with the Project, Alternative 2 would introduce new lighting, including temporary construction lighting, wayfinding lights, security lighting, landscape lighting, street-level commercial signs, paseo lighting, architectural accent lighting, and interior lighting visible through windows, all of which would be installed pursuant to LAMC lighting requirements. Architectural lighting would be provided at the top of the new buildings, as under the Project. In combination with the Capitol Records Building, any architectural lighting and signage would be consistent with HSSUD policy encouraging illuminated signage to reflect a modern, vibrant image of Hollywood. However, as with the Project, no still or moving images would be projected onto the buildings. Project Design Feature AES-PDF-3 would ensure that glass used in building façades will be anti-reflective or treated with an anti-reflective coating in order to minimize glare. Project Design Feature AES-PDF-4 would require that construction and operational lighting be shielded and directed downward (or on the specific on-site feature to be lit) in such a manner so as to avoid undue glare or light trespass onto adjacent uses. Similar to the Project, the incorporation of Project Design Features and LAMC requirements in Alternative 2 would ensure that potential light and glare would not adversely affect day or nighttime views. However, Alternative 2 would result in smaller buildings and reduced scale of lighting compared to the Project and, as such, light and glare effects would be less than the Project.

(b) Air Quality

Daily air quality construction emissions would be similar under the Project and the Project with the East Site Hotel Option. While the Project and the Project with the East Site Hotel Option would have nominally different daily operational emissions, the impact conclusions, significance levels, and mitigation measures are the same for the Project and the Project with the East Site Hotel Option. Accordingly, the below comparisons of impacts of Alternative 2 apply to both the Project and the Project with the East Site Hotel Option.

(i) Conflict with an Air Quality Management Plan

Similar to the Project, Alternative 2 would include new development on the Project Site that would generate new criteria pollutant emissions. Similar to the Project, Alternative 2 would be consistent with the goals of SCAG's 2016-2040 RTP/SCS and growth projections in the 2016 AQMP, since the growth would occur in a HQTA and a TPA. As with the Project, Alternative 2 would be consistent with the AQMP in its incorporation of appropriate control strategies for emissions reduction during construction and operation. In addition, Alternative 2 would also be consistent with applicable goals, objectives, and policies of the Air Quality Element of the General Plan that support and encourage pedestrian activity in the Hollywood area and uses that contribute to a land use pattern addressing housing needs while reducing vehicle trips and air pollutant emissions within a TPA. For all of these reasons,

impacts under Alternative 2 with respect to consistency with air quality management plans would be less than significant and similar to the Project.

(ii) Cumulative Increase in Criteria Pollutants/Violation of Air Quality Standards

(a) Construction

As with the Project, Alternative 2's construction phases have the potential to generate emissions that would exceed SCAQMD air quality standards through the use of heavy-duty construction equipment, construction traffic, fugitive dust emissions, paving operation, and the application of architectural coatings and other building materials. The maximum emissions under Alternative 2 would be similar to the Project because emission levels are based on a single day in which maximum construction activity would occur. Similar to the Project, with incorporation of Mitigation Measure AQ-MM-1 which would require the use of diesel-powered construction equipment that meet USEPA Tier 4 Final off-road emissions standards; use of pole electricity or alternative energy to power electric tools, equipment, and lighting; maintenance and operation of construction equipment to minimize exhaust emissions; and incorporation of Project Design Feature GHG-PDF-1 (Green Building Features), construction emissions under Alternative 2 would not exceed SCAQMD numerical significance thresholds. Similar to the Project, because Alternative 2's construction emission levels would be below the applicable numerical significance thresholds, emissions related to air quality standards would be less than significant. Alternative 2 would reduce the Project's scale of development by approximately 62.7 percent and, thus, would reduce overall construction duration. As Alternative 2 would reduce construction duration, impacts with respect to cumulative increases in criteria pollutants and violations of air quality standards would be less than the Project.

(b) Operation

During operation, Alternative 2 would generate emissions associated with vehicle trips, heating, lighting, other electric and natural gas power requirements, emergency generators, and architectural coatings. Similar to the Project, Alternative 2 would incorporate Project Design Feature GHG-PDF-1 (Green Building Features) and would comply with SCAQMD Rule 1113 regarding architectural coatings. Also, mobile sources emissions would be reduced compared to the Project due to the reduction in traffic trips. NOx emissions would be 76 and 79 pounds per day for the Project and the Project with the East Site Hotel Option, respectively. The emergency generator would generate 60 pounds of the total, and the daily impact threshold is 55 pounds. While a smaller generator could potentially be utilized and acknowledging that there would be a reduction in land use intensity and traffic under Alternative 2, operational NOx exceedances would occur under Alternative 2 due to the high levels of NOx emitted by the emergency generator. Alternative 2 would implement the same Mitigation Measure

AQ-MM-2 as the Project to reduce operational NOx levels to a less-than-significant level.

As Alternative 2 would be developed at a lower intensity and have less traffic than the Project, its operational daily emissions would not exceed the SCAQMD numerical significance thresholds for VOC, CO, SOx, PM10 and PM2.5. Thus, as with the Project, impacts would be less than significant under Alternative 2 for these criteria pollutants. However, because of its reduced emissions, impacts under Alternative 2 with respect to cumulative increases in criteria pollutants and violations of air quality standards would be less than Project.

(iii) Exposure of Sensitive Receptors to Pollutant Concentrations

(a) Localized Emissions

As with the Project, Alternative 2 would generate construction activity and traffic, and increase localized emission levels. It can be expected that maximum daily localized construction emissions would be similar to the Project. However, because of its smaller scale and intensity, localized operational emissions under Alternative 2 would be less than the Project. As with the Project, maximum localized construction and operational emissions at sensitive receptors would be below the localized screening thresholds for NO_X, CO, PM10, and PM2.5, including at the nearest receptors adjacent to the Project Site. Therefore, similar to the Project, with respect to localized construction and operation emissions, impacts to sensitive receptors would be less than significant under Alternative 2. Alternative 2 would substantially reduce the scale of the Project, the duration of construction, and building floor area compared to the Project. The reduction in construction would reduce the duration of localized emissions during construction. The reduction in building floor area and reduced occupancy of the Project Site under Alternative 2 would reduce daily operational localized emissions from less building energy demand, consumer product usage, and architectural coatings usage. Accordingly, impacts under Alternative 2 with respect to localized emissions would be less than under the Project.

(b) Carbon Monoxide Hotspots

Vehicle trips would be less under Alternative 2 than the Project. As such, as with the Project, Alternative 2 would not cause or contribute considerably to the formation of CO hotspots, and impacts would be less than significant. However, because Alternative 2 would reduce the Project's daily vehicle trips, impacts would be less than the Project.

(c) Toxic Air Contaminants

(i) Construction

Under Alternative 2, as with the Project, temporary TAC emissions associated with DPM emissions from heavy construction equipment would occur during construction activities. Mitigation Measure AQ-MM-1 would require utilization of off-road diesel-powered construction equipment that meets or exceeds the most stringent and environmentally protective CARB and USEPA Tier 4 off-road emissions standards. The Tier 4 standards would reduce DPM emissions by approximately 81 to 96 percent compared to equipment that meet the Tier 2 off-road emissions standards. As with the Project, with implementation of the required mitigation, Alternative 2 would not expose sensitive receptors to substantial TAC concentrations, and impacts would be less than significant. However, because Alternative 2 would reduce the scale and duration of construction activities, impacts under Alternative 2 would be less than the Project.

(ii) Operation

Alternative 2, as with the Project, would use consumer products and architectural coatings or involve other sources, such as charbroiling associated with restaurant uses. TAC emissions from these sources are anticipated to be minimal and all restaurant emissions would be regulated under SCAQMD Rule 1138. In addition, Alternative 2, as with the Project, would provide stationary emergency generators in the residential buildings. The emergency generators would result in emissions during maintenance and testing operations. Emergency generators are permitted by the SCAQMD and regulated under SCAQMD Rule 1470. Maintenance and testing would occur periodically, up to 50 hours per year per Rule 1470. As with the Project, Alternative 2's land uses would not include installation of industrial-sized paint booths or require extensive use of commercial or household cleaning products. Alternative 2 would generate only minor amounts of diesel emissions from mobile sources (non-on-site construction vehicles), such as delivery trucks that would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. Furthermore, trucks would be required to comply with the applicable provisions of the CARB 13 CCR, Section 2025 (Truck and Bus regulation) to minimize and reduce PM and NO_X emissions from existing diesel trucks. As a result, toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the uses expected on the Project Site, as with the Project, potential long-term operational impacts associated with the release of TACs under Alternative 2 would be minimal, regulated, and controlled, and would not be expected to exceed the applicable SCAQMD numerical significance thresholds. Operation of Alternative 2, as with the Project, would not expose sensitive receptors to substantial TAC concentrations, and operational impacts would be less than significant. However, because of Alternative 2's reduced overall scale of development and reduction in use of consumer products and other

sources, such as architectural coatings, impacts under Alternative 2 would be less than the Project.

(d) Other Emissions Affecting a Substantial Number of People

Activities under Alternative 2 would potentially generate other emissions, such as those leading to odors. These may include the use of architectural coatings and solvents, as well as the combustion of diesel fuel in on-and off-road equipment. SCAQMD Rule 1113 would limit the amount of VOCs in architectural coatings and solvents. In addition, Alternative 2 would comply with the applicable provisions of the CARB Air Toxics Control Measure regarding idling limitations for diesel trucks. Through mandatory compliance with SCAQMD rules, construction activities and materials are not expected to result in emissions that would create objectionable odors affecting a substantial number of people. Operation of Alternative 2 would not involve land uses typically associated with odor complaints, such as agricultural uses or food processing plants, or any uses identified by the SCAQMD as being associated with substantial odors. As with the Project, Alternative 2 is not expected to discharge contaminants into the air in quantities that would cause a nuisance, injury, or annoyance to the public or property pursuant to SCAQMD Rule 402. Therefore, as with the Project, odor and other emissions impacts under Alternative 2 would be less than significant. Accordingly, impacts with respect to other emissions under Alternative 2 would be similar to the Project.

(c) Cultural Resources

As cultural resources impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 2 apply to both the Project and the Project with the East Site Hotel Option.

(i) Historical Resources

As with the Project, Alternative 2 would not demolish or cause an adverse material change in the eligibility of any historical resources within the Project Site due to direct impacts. Building heights under Alternative 2 (18 stories on the East Site and 14 stories on the West Site) would be lower than the Project and, thus, more consistent with Hollywood's existing built environment than under the Project, which would result in 46- and 35-story buildings on the East Site and West Site, respectively. Compared to the Project, Alternative 2 would have less effect related to contrasting building heights, although potential indirect impacts associated with this contrast under the Project would be less than significant. Therefore, as with the Project, indirect impacts associated with contrasting building heights would be less than significant under Alternative 2, although incrementally less under Alternative 2 than the Project because of the reduction in building heights.

As with the Project, Alternative 2 would also result in temporary alterations to the Hollywood Walk of Fame and potentially significant and unavoidable impacts due to structural vibration at nearby historical resources during construction. As with the Project, impacts associated with Alternative 2 could be reduced to less-than-significant with implementation of Mitigation Measures CUL-MM-1, CUL-MM-2, and NOI-MM-4. As with the Project, the mitigation available for Alternative 2 would avoid significant impacts on the Capitol Records Building and Gogerty Building, and would provide similar protections to the other proximate historical buildings subject to potential structural damage from vibration, as follows: the Pantages Theatre, Avalon Hollywood, and the building located at 6316-24 Yucca Street/Art Deco Storefront. However, because Mitigation Measure CUL-MM-2 and Mitigation Measure NOI-MM-4 require the consent of other property owners, who may not agree to participate in their implementation, it is conservatively concluded that structural vibration and settlement impacts on proximate historical resources would remain significant and unavoidable after implementation of mitigation measures. Nonetheless, because Alternative 2 would reduce the extent and duration of the Project's construction, vibration impacts under Alternative 2 would be less than the Project, and, thus, impacts to historical resources under Alternative 2 would be less than the Project.

(ii) Archaeological Resources

Excavation associated with Alternative 2 would reach depths of approximately 33 feet on the East Site and 22 feet on the West Site, whereas excavation associated with Project would reach depths of approximately 64 feet below the existing ground surface on the East and West Sites. Similar to the Project, these excavations would cut into the historic fill layer, as well as previously undisturbed native soils. Such depths have the potential to encounter prehistoric and/or historic archaeological resources. Alternative 2, as with the Project, would implement Mitigation Measures CUL-MM-3 through CUL-MM-5. With the implementation of these measures, Alternative 2, as with the Project, would provide for appropriate treatment and/or preservation of resources if encountered. Under Alternative 2, as with the Project, potentially significant impacts to archaeological resources would be mitigated to a less-than-significant level. However, because Alternative 2 would involve less excavation, it would have less potential impact on such resources. Thus, impacts related to archaeological resources under Alternative 2 would be less than the Project.

(iii) Human Remains

Excavation associated with Alternative 2 would reach depths of approximately 33 feet on the East Site and 22 feet on the West Site, whereas excavation associated with Project would reach depths of approximately 64 feet below the existing ground surface on the East and West Sites. Pursuant to California Health and Safety Code Section 7050.5, Public Resources Code 5097.98, and California Code of Regulations Section 15604.5(e), any discovery of unrecorded human remains

would require the immediate halting of construction or ground-disturbing activities and notification of the County Coroner. If the remains are determined to be Native American in origin, a "Most Likely Descendent" would be contacted to assist in determining appropriate treatment for the remains. In the event of the discovery of unrecorded human remains during construction, compliance with applicable regulatory requirements would ensure potential impacts are less than significant. Thus, Alternative 2, as with the Project, would have a less-than-significant impact with respect to human remains. Although excavation depths would be reduced under Alternative 2, Alternative 2 would have similar potential to intercept human remains, which are anticipated to occur in shallower soils. Therefore, impacts with respect to human remains would be less than significant under Alternative 2 and similar to the Project.

(d) Geology and Soils

As geology and soils impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 2 apply to both the Project and the Project with the East Site Hotel Option.

(i) Seismic Hazards

The Project Site is located within the designated Alquist-Priolo Earthquake Fault Zone for the Hollywood Fault; however, underlying soil horizons indicate the Project Site has not experienced fault movement for at least 120,000 years and active faulting does not occur beneath the Project Site. Similar to the Project, excavation for Alternative 2's subterranean parking would remove the loose sand deposit and require suitable engineered stabilization in accordance with applicable City and CBC building regulations. The Project Site is not located within a designated landslide area, and the potential for landslide and seismically induced slope instability at the Project Site is considered to be low. As with the Project, Alternative 2's application of appropriate engineering controls and compliance with regulations for planned excavation and construction would minimize any potential site stability geologic hazards at the Project Site. Therefore, development of Alternative 2, as with the Project, would not result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury caused in whole or in part by exacerbation of existing environmental conditions. As with the Project, impacts related to geologic conditions under Alternative 2 would be less than significant through proper engineering methods and compliance with City and CBC building regulations. With implementation of building regulations and recommendations of applicable final geotechnical reports, impacts with respect to seismic hazards under Alternative 2 would be similar to the Project.

(ii) Soil Erosion or Loss of Topsoil

Excavation associated with Alternative 2 would reach depths of approximately 33 feet on the East Site and 22 feet on the West Site, whereas excavation associated

with Project would reach depths of approximately 64 feet below the existing ground surface on the East and West Sites. Similar to the Project, construction of the Alternative 2 would increase soil exposure and risk of soil erosion. The potential for water erosion under Alternative 2 would be reduced by the implementation of standard erosion control measures during site preparation and grading activities. Construction activities would be carried out in accordance with applicable City standard erosion control practices required pursuant to the CBC and the requirements of the NPDES Construction General Permit issued by the LARWQCB, as applicable. In accordance with these requirements, a SWPPP would be prepared that incorporates BMPs to control water erosion during the construction period. Following construction, the Project Site would be covered completely by paving, structures, and landscaping, which would not leave any exposed areas of bare soil susceptible to erosion. Thus, similar to the Project, impacts due to erosion of topsoil would be less than significant under Alternative 2. Alternative 2, like the Project, would comply with CBC building regulations and implement a SWPPP and BMPs and, as with the Project, would result in less than significant soil erosion impacts. However, because Alternative 2 would entail shallower excavation, the extent and duration of excavation activities would be reduced. As such, impacts under Alternative 2 would be less than the Project.

(iii) Unstable Geologic Units

Alternative 2, as with the Project, would include sloped excavations that would be properly shored in accordance with the applicable provisions of the CBC to minimize the potential for site stability hazards during temporary excavation activities. As with the Project, Alternative 2 would not be located on an unstable geologic unit. In addition, Alternative 2 would comply with CBC requirements and, prior to issuance of a grading permit, a qualified geotechnical engineer must prepare and submit to the LADBS a Final Geotechnical Report that includes site-specific design recommendations for seismic safety and design requirements for foundations, retaining walls/shoring and excavation to meet applicable State and City code and regulations. As with the Project, through adherence to the CBC and the recommendations of the Final Geotechnical Report, impacts with respect to geologic units under Alternative 2 would be less than significant, and would be similar to the Project.

(iv) Expansive Soils

Similar to the Project, Alternative 2 would encounter and remove near surface soils that have a low to medium potential for expansion during excavation activities. In addition, expansive soil hazards would be further evaluated for the Project Site as part of the LADBS approved Final Geotechnical Report that would include site-specific design recommendations for addressing expansive soils, as needed. Further, as with the Project, compliance with standard construction and engineering practices, and proper engineering erosion control and drainage design would ensure that hazards associated with potential expansive soils or corrosive

soils are properly addressed. As such, as with the Project, impacts related to expansive soils or corrosive soils under Alternative 2 would be less than significant and similar to the Project.

(v) Paleontological Resources

Substantial excavation within the Project Site during construction for subterranean parking, extending to 33 feet under Alternative 2 (compared to 64 feet under the Project), could access high sensitivity alluvial sediments. This classification indicates a high potential for fossils to be present in the subsurface. Similar to the Project, implementation of Mitigation Measures GEO-MM-1 through GEO-MM-3 under Alternative 2 would provide for appropriate treatment and/or preservation of resources and would mitigate impacts to paleontological resources to less-than-significant. However, because excavation depths would be less under Alternative 2, impacts related to paleontological resources would be less than the Project.

(a) Greenhouse Gas Emissions

Despite the Project and the Project with the East Site Hotel Option having slightly different overall GHG emissions, because impact conclusions and significance levels related to GHG emissions would be the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 2 apply to both the Project and the Project with the East Site Hotel Option.

The construction and occupancy of the Project Site under Alternative 2, as with the Project, would increase GHG emissions. As with the Project, Alternative 2 would incorporate GHG reduction characteristics, features, and measures. Although the State and City have not established quantitative values for GHG emissions, in order to comply with policies and regulations adopted for the purpose of reducing or mitigating GHG emissions, Alternative 2, as with the Project, would incorporate AQ-PDF-1, AQ-PDF-2 and GHG-PDF-1. The smaller scale and lower mobile emissions associated with Alternative 2 would generate lower GHG emissions than the Project's maximum GHG operational emissions. With incorporation of applicable Project Design Features, GHG emission impacts under Alternative 2, as with the Project, would be less than significant. Due to its lower GHG emissions, under Alternative 2 with respect to GHG emissions, impacts on the environment would be less than the Project.

Alternative 2, as with the Project, with incorporation of AQ-PDF-1, AQ-PDF-2 and GHG-PDF-1, would be consistent with applicable strategies outlined in CARB's Climate Change Scoping Plan, SCAG's 2016-2040 RTP/SCS, Sustainable City pLAn, and the City's Green Building Code. As such, similar to the Project, impacts related to conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs would be less than significant under Alternative 2. As discussed under the Transportation subsection, below,

Alternative 2, as with the Project, would result in a household per capita VMT of 4.8 and is exempt from a retail VMT per capita finding. The Project with the East Site Hotel Option would result in a 4.7 household per capita VMT and 4.8 work VMT per employee. As such, because Alternative 2 would result in a substantially similar VMT rate and would not conflict with applicable GHG plans, similar to the Project, impacts under Alternative 2 with respect to conflicts with GHG plans adopted for the purpose of reducing the emissions of GHGs would be less than significant and similar to the Project.

(b) Hazards and Hazardous Materials

As impacts related to hazards and hazardous materials would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 2 apply to both the Project and the Project with the East Site Hotel Option.

(i) Hazards to the Public or Environment through the Routine Transport, Use, or Disposal of Hazardous Materials

Construction of Alternative 2, as with the Project, would include demolition of existing parking surfaces and structures other than the Capitol Records Complex. Construction equipment and materials, such as fuels, oils and lubricants, solvents and cleaners, adhesives, paints and thinners, degreasers, cement and concrete, and asphalt mixtures, which are all commonly used in construction, would be used, stored, and disposed of in consumer quantities and in accordance with applicable laws and regulations and manufacturers' instructions. As with the Project, operation of Alternative 2 would involve the limited use of potentially hazardous materials typical of those used in residences, offices, hotels and restaurants, including cleaning agents, paints, pesticides, and other materials used for landscaping. In addition, hazardous materials on the Project Site would continue to be acquired, handled, used, stored, and disposed of in accordance with all manufacturers' specifications and all applicable federal, State, and local requirements. Compliance with all applicable regulations concerning the transport, use, and disposal of hazardous waste under Alternative 2, as with the Project, would reduce hazardous materials impacts to a less-than-significant level. Although Alternative 2 would comply with the same regulations as the Project, because Alternative 2 would substantially reduce the scale of the Project's construction and operation activity (e.g., use less volume of the hazardous chemicals needed for construction and household maintenance), impacts would be less under Alternative 2 than the Project.

(ii) Hazard to the Public or Environment Involving the Accidental Release of Hazardous Materials into the Environment

Alternative 2 would require excavation of soil for up to three levels of subterranean parking. Such excavation could expose the public or the environment to contaminated soils and soil vapors, and could reveal remnant steel structures and/or possibly USTs associated with historic automobile gas and service stations. As with the Project, under Alternative 2, Mitigation Measure HAZ-MM-1 (Soil Management Plan), would be implemented and would establish policy and requirements for the disposal of contaminated soils and management of soil vapors or other gases during excavation activities. Therefore, impacts under Alternative 2 related to the accidental release of hazardous materials during construction would be less than significant after mitigation and similar to the Project.

(iii) Hazard Resulting from Hazardous or Acutely Hazardous Materials, Substances, or Waste within One-Quarter Mile of a School

Alternative 2, as with the Project, is not located within one-quarter mile of a school. Similar to the Project, Alternative 2 would implement Mitigation Measure HAZ-MM-1 (Soil Management Plan), which would establish policy and requirements during construction for the disposal of contaminated soils and management of soil vapors or other gases during excavation activities. Also, similar to the Project, Mitigation Measure AQ-MM-1 would be implemented under Alternative 2 requiring the use of Tier IV construction equipment to minimize TAC emissions. In addition, during operation Alternative 2 would not require the handling of acutely hazardous materials or result in the emission of hazardous materials other than, potentially, VOCs associated with diesel vehicles and consumer products (e.g., architectural coatings, household cleaners, landscaping fertilizers and pesticides, etc.). Alternative 2, as with the Project, during operation would only require the limited use of potentially hazardous materials associated with domestic maintenance and landscaping. In addition, Alternative 2 would comply with applicable local, State, and federal laws and regulations relating to the use of hazardous or acutely hazardous materials. Therefore, as with the Project, impacts related to the use of hazardous or acutely hazardous materials within a quarter mile of a school under Alternative 2 would be less than significant and similar to the Project.

(iv) Hazards Materials Sites

Alternative 2, similar to the Project, would not involve construction or alter existing activities on a hazardous materials site compiled pursuant to Government Code Section 65962.5. Accordingly, Alternative 2 and the Project would have no impact with regard to development occurring on a hazardous materials site. Thus, impacts

related to development on a hazardous materials site under Alternative 2 would be similar to the Project.

(v) Emergency Response Plan/Emergency Response Plan

Alternative 2, as with the Project, would involve new construction and increased traffic. Alternative 2, as with the Project, would not however, affect the City's Operations Plan or established disaster evacuation routes, the nearest of which are Santa Monica Boulevard approximately 0.8 miles to the south and Highland Avenue approximately 0.6 miles to the west. As with the Project, Alternative 2 would not require any policy or procedural changes to the City of Los Angeles Emergency Operations Plan or the City's established disaster routes. Also, during an unanticipated disaster event, the LAPD and LAFD would implement operational protocols, as well as plans and programs, on a case-by-case basis, to facilitate emergency evacuations and/or response, which would consider traffic conditions at the time of the emergency. In such instances, traffic would be routed along the City's numerous disaster routes, as determined appropriate by the responding City agencies. Similar to the Project, construction and operation of Alternative 2 would not close any existing streets or otherwise represent a significant impediment to emergency response or evacuation of the local area. Construction of Alternative 2, as with the Project, would occur within the boundaries of the Project Site and within the rights-of-way of adjacent streets, including the median within Vine Street and signal installation along Argyle Avenue. Temporary partial lane closures are not anticipated to significantly affect the circulation of emergency vehicles, which normally have a variety of options for dealing with traffic and congestion, such as sirens, priority use of the roadway, and use of alternate routing. In addition, Alternative 2, as with the Project, would implement Project Design Feature TRAF-PDF-2, which requires preparation of a Construction Traffic Management Plan and includes street closure information, a detour plan, haul routes, and a staging plan. The Construction Traffic Management Plan will be submitted to the City for review and approval. With Project Design Feature TRAF-PDF-2, construction of Alternative 2, like the Project, would not substantially impede public access, create severe consequences for emergency response vehicles, substantially impede travel upon a public right-of-way, or interfere with an adopted emergency response or evacuation plan. During operation, Alternative 2, as with the Project, would be required to establish, implement, and maintain an emergency response plan. The emergency response plan, which would be submitted to the LAFD for inspection and approval prior to implementation, would be inspected annually by the LAFD and include evacuation procedures. In addition, the California Fire Code, Chapter 10, Means of Egress, requires that all habitable structures comply with the California Fire Code, including providing ingress and egress during emergencies. As with the Project, compliance with existing regulations would ensure that an adequate emergency response plan is established for Alternative 2. Overall, as with the Project, impacts under Alternative 2 with respect to conflicts with or

interfering with emergency response or evacuation plans would be less than significant. However, because Alternative 2 would generate less traffic and result in lower occupancy than the Project, impacts with regard to emergency response would be less than the Project.

(c) Hydrology and Water Quality

As hydrology and water quality impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 2 apply to both the Project and the Project with the East Site Hotel Option.

(i) Water Quality

(a) Construction

Alternative 2, as with the Project, would include construction activities, including earth moving, maintenance/operation of construction equipment, potential dewatering, and handling/storage/disposal of materials, that could contribute to pollutant loading in stormwater runoff from the construction site. Also, wind could convey exposed and stockpiled soils at the construction site into nearby storm drains during storm events, and on-site water activities for dust suppression purposes could contribute to pollutant loading in runoff from the construction site. Alternative 2 would excavate for subterranean garages to depths of approximately 33 feet; whereas, the Project would excavate for subterranean garages to depths of approximately 64 feet, with both reaching deeper levels for foundation features. Groundwater depths range from less than 49.2 bgs to approximately 98.3 feet bgs across the Project Site. Alternative 2, as with the Project, has the potential to encounter groundwater during construction. Dewatering, which is subject to LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, may be required. The potential impact related to pollutant loading or groundwater quality that would cause exceedances of water quality standards would be reduced to less-than-significant levels for Alternative 2, as well as the Project, through compliance with regulatory requirements, BMPs, and Building Code grading procedures. However, because of the reduced scale and depth of excavation under Alternative 2, the potential exposure of excavated soils to the elements and encroachment into the water table would be less than under the Project. As such, the potential impact with respect to violations of water quality standards during construction would be less under Alternative 2 than the Project.

(b) Operation

Alternative 2, as with the Project, would incorporate a drainage collection and conveyance system that would detain and treat/filter runoff in compliance with the City's LID Manual requirements to reduce the quantity of, and improve the quality

of, rainfall runoff leaving the Project Site. With the implementation of such system and BMPs, Alternative 2, as with the Project, would result in an improvement in the quality of stormwater runoff from the Project Site compared to existing conditions. As with the Project, impacts related to water quality standards under Alternative 2 would be less than significant, and would be similar to the Project.

(ii) Decreases in Groundwater Supplies or Recharge

Alternative 2, as with the Project, would not require groundwater withdrawal. However, similar to the Project, excavation for the foundations and the subterranean garages during construction of Alternative 2 would have the potential to intercept the groundwater table and, as such, some groundwater removal may be required during construction. Such dewatering during construction would not result in the substantial removal of groundwater that would reduce the local groundwater table. Further, dewatering would only occur temporarily during construction and would not continue post-construction

Under Alternative 2, as with the Project, subterranean parking would be below the redeveloped areas of the Project Site, resulting in no material change to the amount of stormwater that would percolate into the groundwater table compared to existing conditions. Therefore, similar to the Project, pre- and post-Project infiltration volumes are considered effectively equivalent under Alternative 2. Accordingly, similar to the Project, there would not be a substantial reduction in groundwater recharge from current conditions and Alternative 2 would not introduce activities that could impede sustainable groundwater management of the basin.

Overall, neither Alternative 2 nor the Project would cause substantial depletion of groundwater supplies or substantially interfere with groundwater recharge. Therefore, the impact regarding groundwater recharge or depletion under Alternative 2 would be less than significant and similar to the Project.

(iii) Alteration of Drainage Pattern

(a) Construction

Alternative 2, as with the Project, would include construction activities that could contribute to erosion or siltation if soils are exposed during development of the Project Site. Alternative 2 would require substantially less excavation and export of materials compared to the Project. Similar to the Project, Alternative 2 would cause a temporary increase in permeable surfaces during construction that would reduce, rather than increase, off-site runoff from the Project Site during a portion of the construction. As with the Project, construction BMPs to manage runoff flows and avoid on- or off-site flooding, would be implemented under Alternative 2. As with the Project, the BMPs would reduce runoff that would potentially create or contribute runoff water exceeding the capacity of existing or planned stormwater

drainage systems. With implementation of BMPs, impacts with respect to surface runoff, siltation, rates of runoff and capacity of drainage systems under Alternative 2, as with the Project, would be less than significant. Although the duration of construction activities would be less under Alternative 2 than under the Project, the maximum off-site flow of Alternative 2 would be similar and the impact regarding stormwater drainage system capacity would be similar to the Project. However, because excavation volumes would be substantially less under Alternative 2 than under the Project, the potential impact under Alternative 2 associated with alteration of a drainage pattern resulting in erosion or siltation during construction would be less than the Project.

(b) Operation

Alternative 2, as with the Project, would largely maintain existing drainage patterns at the Project Site. As with the Project, Alternative 2 would include a drainage system that meets City stormwater retention, treatment and runoff requirements, including all applicable LID requirements. Additionally, under Alternative 2, as with the Project, a reduced peak flow rate of stormwater runoff from the Project Site would occur due to the retention afforded by the proposed LID system and LID BMPs. Due to the similarity in site coverage and in the proposed stormwater retention system, the volume of stormwater runoff from the Project Site requiring conveyance by the existing off-site storm drain system would decrease to the same extent under Alternative 2 as with the Project. Therefore, impacts under Alternative 2 would be less than significant and similar to the Project.

(iv) Pollutant Release in Flood Hazard, Tsunami, or Seiche Zones

The Project Site is not located within a 100-year floodplain and is not in a tsunami zone and would not be subject to such flooding hazards. The Project Site is located approximately one mile from the Hollywood Reservoir. Given the distance to the Hollywood Reservoir, any oscillation and subsequent release of water within the reservoir as part of a seiche would not inundate the Project Site. Thus, there would be no potential for risk of release of pollutants due to inundation by seiche.

The Project Site is located within the Hollywood Reservoir inundation area.[8] In compliance with applicable regulatory requirements, Alternative 2, as with the Project, would implement BMPs to minimize pollutants within the Project Site during construction. Post-construction, the nature of pollutants would be typical of other developed sites within the dam inundation area. Dam safety regulations executed by the California Department of Water Resources and other agencies are the primary means of reducing damage or injury due to inundation occurring from dam failure, and reduce the likelihood of inundation. Regarding pollutant

8 California Depart. of Water Resources, Division of Safety of Dams, Dam Inundation Map for Mulholland Dam, https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2, accessed March 15, 2020.

release, because Alternative 2, as with the Project, would actively maintain a stormwater management system and would be entirely developed with enclosed parking, buildings, and established landscaping, the exposure of flood waters to pollutants would be minimized. Thus, in the unlikely event of on-site inundation, Alternative 2, like the Project, would not result in the release of significant types or quantities of pollutants. As with the Project, impacts with respect to a significant risk of release of pollutants to inundation by flooding, tsunami, or seiche under Alternative 2 would be less than significant, and would be similar to the Project.

(v) Implementation of Water Quality Control Plans

Alternative 2, as with the Project, would incorporate into its design an on-site drainage system that would be consistent with water quality control plans, the policies of which are expressed in City and State water quality regulations for the protection of water resources. Alternative 2, as with the Project, falls within the jurisdiction of water quality plan regulations that assure that development projects are in compliance with clean water policies. These plans and regulations include the LARWQB (Region 4) Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties and the NPDES stormwater permitting program. In compliance with the City's LID requirements, Alternative 2, as with the Project would install a capture and reuse system on each site. The detention would temporarily store the captured stormwater until the stored volume is entirely used through the irrigation system. The on-site drainage system would also provide BMPs in accordance with the City's LID requirements. As with the Project, impacts related to water quality control plans under Alternative 2 would be less than significant and similar to the Project.

(d) Land Use and Planning

As land use impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 2 apply to both the Project and the Project with the East Site Hotel Option.

Alternative 2 proposes up to 480,516 square feet of residential and commercial floor area, with an approximate FAR of 2.96:1 and 36,141 square feet of publicly accessible open space. The FAR and uses would be consistent with the density restriction of the existing C2-2 zoning designation. Conversely, the Project proposes up to 1,287,150 square feet of residential and commercial floor area with an approximate FAR of 6.973:1.[9] Alternative 2 would not require the Project's proposed amended zoning to C2-2-SN to eliminate the D Limitation, which limits FAR to 3:1 and 2:1 on certain parcels. Alternative 2 would also not conflict with the

[9] The Project with the East Site Hotel Option would provide 1,277,741 square feet of total floor area.

zoning on individual parcels and would not require the Project's requested Conditional Use Permit to allow FAR averaging.

As with the Project, Alternative 2 would not conflict with applicable 2016-2040 RTP/SCS goals to facilitate land use patterns that link land use and sustainable transportation options or the Framework Element Regional Center designation and policies that support a diversity of land uses, and provide for the spatial distribution of development that promotes a reduction of vehicle trips, VMT, and air pollution. Overall, similar to the Project, the density and location of Alternative 2 would not conflict with policies of local and regional land use plans adopted to avoid or mitigate environmental effects and, as such, impacts with respect to land use would be less than significant. Although Alternative 2 would not further regional and local policies to provide affordable housing or increase transit use to the same extent as under the Project, because no changes in zoning or land use designations would be required, impacts in relation to existing plans that avoid or reduce environmental impacts would be less under Alternative 2 than the Project.

(e) Noise

Maximum daily construction noise and vibration levels would be similar under the Project and the Project with the East Site Hotel Option. While the Project and the Project with the East Site Hotel Option would have nominally different daily operational mobile source noise levels, the impact conclusions, significance levels, and mitigation measures are the same for the Project and the Project with the East Site Hotel Option. Accordingly, the below comparisons of impacts of Alternative 2 apply to both the Project and the Project with the East Site Hotel Option.

(i) Noise Levels in Excess of Standards

(a) Construction

Alternative 2 would entail construction activities and excavations for subterranean garages, to 22 feet deep on the West Site and 33 feet deep on the East Site, compared to up to 64 feet deep (subterranean garage depth only) under the Project. These activities would require the use of heavy-duty machinery. Similar to the Project, maximum construction activities under Alternative 2 would increase noise levels at several sensitive receptor locations in the area. As with the Project, because the maximum amount of construction equipment operating simultaneously within the Project Site would be constrained by the size of the property, the maximum construction noise levels under Alternative 2 would be the same as the Project. Based on a conservative impact analysis, in which noise levels were calculated with all pieces of construction equipment operating simultaneously and located at the construction area nearest to the affected receptors, construction noise levels would exceed the applicable noise significance thresholds at several nearby noise sensitive receptors. Therefore, as with the Project, Mitigation Measures NOI-MM-1 to NOI-MM-3 would be

implemented to reduce construction noise impacts at off-site noise sensitive receptors to the extent technically feasible. However, as with the Project, with implementation of technically feasible mitigation, construction noise impacts at noise-sensitive receptors 1, 3, and 5 through 13 (eleven sites) would still exceed the significance threshold under Alternative 2. Therefore, as with the Project, construction noise impacts associated with on-site noise sources would remain temporarily significant and unavoidable for Alternative 2. Similar to the Project, maximum construction traffic would not result in significant noise levels (greater than 5 dBA L_{eq}) compared to existing traffic noise levels along any of the studied roadway segments, and impacts would be less than significant. Although construction noise levels associated with on-site noise sources would be significant and unavoidable under Alternative 2, Alternative 2 would require substantially less excavation and scale of development. Therefore, the duration of construction noise exceedance levels would be shorter. As such, impacts related to construction noise under Alternative 2 would be less than the Project.

(b) Operation

Alternative 2, as with the Project, would increase off-site traffic and generate on-site composite noise associated with fixed equipment, vehicle activity, and human outdoor activity. However, Alternative 2 would involve a smaller scale project with fewer overall off-site vehicle trips from a maximum of 4,504 (Project with the East Site Hotel Option) to 2,420 under Alternative 2 (an approximately 46-percent reduction); therefore, operational mobile source noise impacts would be incrementally less under Alternative 2 than the Project with the East Site Hotel Option. It is acknowledged that differences in off-site mobile source noise level increases along the studied roadway segments under the Project and the Project with the East Site Hotel Option would be negligible and less than 0.1 dBA CNEL for all analyzed roadway segments. Assuming a 46-percent reduction in Alternative 2-related traffic volumes on the analyzed roadway segments compared to the Project with the East Site Hotel Option, the maximum increase in Alternative 2-related traffic noise levels over Future (2040) traffic noise levels would be approximately 0.3 dBA CNEL (from 63.9 to 64.2 dBA CNEL) along Ivar Avenue between Hollywood Boulevard and Selma Avenue and would not exceed the significance threshold of a 5-dBA CNEL. Comparatively, the Project with the East Site Hotel Option (or the Project) would result in a 0.6-dBA increase along this same roadway segment in 2040. This difference in mobile source noise would not be perceptible, and, as such, traffic noise impacts under Alternative 2 would be less than significant and similar to the Project.

With a decrease in residential units compared to the Project, operational noise levels from residential activities and functions would be less than the Project. Alternative 2 would also include a paseo but without a performance stage near the “Hollywood Jazz: 1945-1972” mural, and, as such, performance-related noise from this area of the paseo would not occur. However, similar to the Project, any

outdoor performances under Alternative 2 would be subject to the noise restrictions in NOI-PDF-3, which would limit noise levels from adversely affecting nearby noise-sensitive receptors. Thus, in general, noise generated from the paseo under Alternative 2 at off-site noise sensitive locations would be largely similar to the Project with the outdoor performance sound restrictions in place. As such, noise generated from the paseo under Alternative 2 would be the same or less than the Project when considering fewer on-site residents may attend these events under Alternative 2. Overall, composite operational noise levels would be less than significant and similar to the Project.

(ii) Groundborne Noise and Vibration

(a) Construction

Construction of Alternative 2, as with the Project, would generate groundborne construction vibration during building demolition and site excavation/grading activities when heavy construction equipment is used. As with the Project, the estimated vibration velocity levels from all construction equipment (maximum construction conditions) under Alternative 2 would be below the building damage significance criteria at off-site building structures west and east of the West Site and East Site construction areas. However, as with the Project, the estimated construction vibration levels under Alternative 2 would exceed the significance threshold at the Avalon Hollywood, the Pantages Theatre, the Yucca Street Art Deco Building Storefront, the AMDA Vine building, the Argyle House, the Commercial Building at 1718 Vine Street, the Capitol Records Building, and the Gogerty Building. Therefore, vibration impacts pursuant to the significance criteria for building damage would be significant. As with the Project, with implementation of Mitigation Measure NOI-MM-4 and compliance with LAMC Section 91.3307.1, vibration impacts associated with Alternative 2 would be reduced to less-than-significant levels for the Capitol Records and Gogerty Buildings. However, similar to the Project, because consent of off-site property owners, who may not agree, would be required to implement the vibration mitigation for potential structural damage to their off-site structures, it is conservatively concluded that structural vibration impacts on the AMDA Vine Building, the Argyle House, the Commercial Building at 1718 Vine Street, the Pantages Theatre, Avalon Hollywood, and Art Deco Building Storefront would remain significant and unavoidable because it cannot be assured that all components of NOI-MM-4 can be implemented.

Regarding human annoyance, as with the Project, the estimated vibration levels due to maximum construction activity at the West Site under Alternative 2 would exceed the significance threshold for human annoyance at vibration sensitive receptors near the Project Site. Implementation of Mitigation Measure NOI-MM-4, under Alternative 2, as with the Project, may lessen but would not reduce all human annoyance impacts to a less-than-significant level. Therefore, as with the Project, no feasible mitigation measures under Alternative 2 would reduce the temporary vibration impacts from on-site construction associated with human

annoyance at the vibration-sensitive receptors 3, 5, 6, and 8 through 13. As with the Project, construction vibration levels would be significant and unavoidable under Alternative 2. However, because the overall scale of development would be reduced by approximately 62.7 percent under Alternative 2, the duration of construction and overall construction activity causing vibration would be less, and impacts under Alternative 2 would be less than the Project.

(b) Operation

Day-to-day operations under Alternative 2, as with the Project, would include typical commercial-grade stationary mechanical and electrical equipment, which would produce vibration at low levels that would not cause damage or annoyance impacts to on-site or off-site environment. Primary sources of transient vibration would include vehicle circulation within the proposed parking areas, which would be confined to the immediate area and would not be expected to be perceptible off the Project Site. It is anticipated that mechanical equipment, including air handling units, condenser units, and exhaust fans, under Alternative 2, as with the Project, would be located on building rooftops. Therefore, as with the Project, groundborne vibration from the operation of such mechanical equipment under Alternative 2 would not impact any of the off-site sensitive receptors. Thus, similar to the Project, operational vibration impacts under Alternative 2 would be less than significant. As Alternative 2 would reduce the overall occupancy of the Project Site, off-site groundborne operation vibration is not anticipated to be perceptible under Alternative 2, and, as such, impacts under Alternative 2 would be similar to the Project.

(f) Population and Housing

During operation, the Project and the Project with the East Site Hotel Option would have different population, housing, and employment generation statistics. However, both development scenarios would result in the same impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of Alternative 2 apply to both the Project and the Project with the East Site Hotel Option.

Alternative 2, as with the Project, would increase occupancy and use of the Project Site. Alternative 2 would provide 384 market rate units, a reduction of approximately 61.8 percent, compared to the Project, and would generate approximately 929 new residents.[10] Retail and restaurant uses under Alternative 2 would generate approximately 206 employees.[11] The Project would provide

10 Based on 2017 Census American Community Survey 5-Year Estimate data (2013–2017), www.census.gov/programs-surveys/acs/technical-documentation/table-and-geography-changes/2015/5-year.html, per correspondence with Jack Tsao, Housing Planner, Los Angeles Department of City Planning, July 31, 2019.

11 Based on HR&A Economic and Fiscal Impact Report evaluation in which the factor for the Project's retail/restaurant uses would be one employee per 146.5 square feet of floor area.

1,005 residential units, generating approximately 2,433 new residents, and would include 30,176 square feet of retail/restaurant uses, which would generate approximately 206 employees. The Project with the East Site Hotel Option would provide 884 residential units and generate approximately 2,140 new residents. The Project with the East Site Hotel Option, based on 130,278 square feet of hotel floor area would also generate approximately 239 employees[12] and its retail/restaurant uses would generate approximately 206 new employees, for a total of approximately 445 new employees. As with the Project, additional employees may be associated with on-site security and maintenance under Alternative 2.

Alternative 2 would generate a population increase of 929 new residents, which would represent approximately 0.38 percent of SCAG's 2018-2027 population growth projection of 241,442 and approximately 0.14 percent of SCAG's 2018-2040 population growth projection of 635,275. Alternative 2's 206 new employees would represent approximately 0.14 percent of SCAG's 2018-2027 employment growth projection of 146,255 and approximately 0.06 percent of SCAG's 2019-2040 employment growth projection of 320,375. Alternative 2, as with the Project, would not exceed SCAG's growth projections, would help the City meet its housing obligation under SCAG's RHNA allocation, and would provide the type of transit oriented development encouraged in the Los Angeles General Plan and SCAG 2016-2040 RTP/SCS policies. No existing residences would be displaced. As such, Alternative 2, as with the Project, would result in a less than significant population and housing impacts. Although Alternative 2 would not implement the objectives of SCAG's RHNA allocation or concentrate transit-oriented development to the same extent as under the Project, because SCAG population and housing projections would not be exceeded, impacts with respect to substantial unplanned population growth under Alternative 2 would be less than significant and similar to the Project.

(g) Public Services

During operation, the Project and the Project with the East Site Hotel Option would have different service-related population statistics, such as number of residents or students. However, both development scenarios would result in the same impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts Alternative 2 apply to both the Project and the Project with the East Site Hotel Option

(i) Fire Protection

Alternative 2, as with the Project, would involve construction activities and intensify the use of the Project Site so that it would increase demand on fire protection and emergency medical services, as well as potentially reduce emergency access.

12 Based on HR&A Economic and Fiscal Impact Report evaluation in which the factor for the Project's retail/restaurant uses would be one employee per 545 square feet of hotel floor area.

Alternative 2, as with the Project, would incorporate Project Design Feature TRAF-PDF-2 to provide a Construction Traffic Management Plan to improve vehicular access around the construction site. Project Design Feature TRAF-PDF-3 would identify and enforce parking location requirements for construction workers. The implementation of these Project Design Features would facilitate emergency access. As such, similar to the Project, construction under Alternative 2 would result in less-than-significant impacts with respect to emergency response times and emergency access.

During operation, Alternative 2 would result in a population increase of 929 persons and 206 employees. By comparison, the Project would result in a population increase of 2,433 persons and 206 new employees. The Project with the East Site Hotel Option would result in a population increase of 2,140 persons and 445 employees. Alternative 2, as with the Project, would comply with the applicable OSHA, Building Code, Fire Code, other LAMC, and LAFD requirements and recommendations, which would reduce demand on LAFD facilities and equipment without creating the need for new or expanded fire facilities. In addition, the Project Site is located within a highly urbanized area accessed via an established street system and within the LAFD's maximum prescribed response distances. Due to urban proximity and facilitated travel for high priority emergency calls, impacts on emergency response would not be significant. Alternative 2, as with the Project, would also be consistent with LAMC fire flow requirements. As such, Alternative 2, as with the Project, would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. Impacts under Alternative 2, as with the Project, would be less than significant. However, because Alternative 2 would reduce construction duration and Project Site occupancy (employees plus residents) compared to the Project, impacts related to fire protection services under Alternative 2 would be less than the Project.

(ii) Police Protection

Alternative 2, as with the Project, would result in construction and operation activities that could affect emergency access and increase demand for police protection services. As with the Project, Alternative 2's construction phase, although of shorter duration than that of the Project, could increase potential demand for LAPD services related to theft or vandalism and increased worker activity, as well as construction traffic that could affect emergency response times. To reduce LAPD demand during construction, Alternative 2, as with the Project, would implement a number of security measures under Project Design Feature POL-PDF-1 to limit access to construction areas, including private security, construction fencing, and locked entry. Similar to the Project, construction activities under Alternative 2 may involve temporary lane closures or increase travel time

due to flagging or stopping traffic to accommodate trucks entering and exiting the Project Site. Under Project Design Feature TRAF-PDF-2, a Construction Traffic Management Plan would ensure that adequate and safe access remains available at the Project Site during construction activities. Project Design Feature TRAF-PDF-3 would implement a Construction Worker Parking Plan to identify and enforce parking location requirements for construction workers. As with the Project, most construction staging for Alternative 2 would occur on the Project Site, and construction workers would generally start and end their work days in advance of peak traffic hours; thus, reducing their potential effect on traffic and emergency response times. Furthermore, construction-related traffic generated by Alternative 2, as with the Project, would not significantly impact LAPD response times within the Project vicinity as LAPD vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic during construction.

According to LAPD service population generation factors,[13] and assuming that 85 percent of Alternative 2's 384 residential units were one- and two-bedroom (326 units), which would generate an estimated service population gain of 978 residents, and 15 percent of Alternative 2's 384 units were three-bedroom or more (58 units), which would generate a gain of 232 residents, Alternative 2 would result in a gain of 2,996 in residential service population. Similar to the Project, Alternative 2's 30,176 square feet of retail/restaurant floor area would generate a total of 91 employees. In total, Alternative 2 would increase the LAPD service population by 1,210. According to the same crime factors used by the Project of 15 crimes per 1,000 population, the increase in service population generated by Alternative 2 could result in 19 crimes per year.[14] In comparison the Project and the Project with the East Site Hotel Option would result in 49 and 48 crimes per year, respectively.

The LAPD determines the need for new officers based on a variety of non-definitive factors (i.e., shifts in station and/or patrol boundaries, ongoing staff changes, service populations and crime statistics may be considered when new officers are hired). Alternative 2, as with the Project, would incorporate Project Design Feature POL-PDF-2 to provide a 24-hour/seven-day security program to ensure the safety of its residents, employees, and site visitors. These measures would reduce demand on police services during operation. Similar to the Project, with the implementation of these features, Alternative 2 would not increase police services demand to the extent that the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, Alternative 2, as with the Project, would not result in potential physical impacts associated with construction of police facilities and impacts with

13 LAPD service population generation factors are: 3 residents per one- and two-bedroom units, 4 residents per three-bedroom unit, and 3 persons per 1,000 square feet of commercial floor area.

14 Crime total rounded up to next whole number.

respect to police protection would be less than significant. However, with the reduction in scale of development and occupancy under Alternative 2, impacts to police protection services under Alternative 2 would be less than the Project.

(iii) Schools

Alternative 2 would result in 621 fewer residential units than the Project and 488 fewer residential units than the Project with the East Site Hotel Option. As such, Alternative 2 would generate proportionately fewer students when compared to the Project. The 384 residential units constructed under Alternative 2 would generate approximately 98 elementary school students, 27 middle school students, and 56 high school students totaling 181 students. [15,16]In contrast, the Project and the Project with the East Site Hotel Option would generate 441 students and 424 students, respectively. Similar to the Project, the additional students generated by Alternative 2 could potentially exceed the number of seats available at local schools. However, pursuant to Section 65995 of the California Government Code, the Project Applicant would be required to pay fees in accordance with SB 50. Payment of such fees is intended for the general purpose of addressing the construction of new school facilities, whether schools serving the Project are at capacity or not and, pursuant to Section 65995(h), payment of such fees is deemed to be full mitigation of a project's development impacts. As such, impacts to school facilities and services under Alternative 2 would, as with the Project, would be less than significant. However, because Alternative 2 would generate fewer school-age children than under the Project, impacts on schools would be less than the Project.

(iv) Parks and Recreation

Alternative 2 would generate approximately 1,186 new residents that would utilize parks and recreation facilities. In contrast, the Project and the Project with the East Site Hotel Option would generate approximately 2,433 new residents and 2,140 residents respectively. Alternative 2, as with the Project, would comply with LAMC Section 21.10.3, which requires a dwelling unit construction tax of $200 for each new residential unit for City acquisition of new park space. Furthermore, Alternative 2, as with the Project, would meet the requirements of LAMC Sections 12.21 and 17.12, and 21.10.3(a)(1) regarding the provision of useable open space. Although Alternative 2, as with the Project, would not meet the parkland provision goals set forth in the PRP, which recommends 2.0 acres each of neighborhood and community recreational sites and facilities per 1,000 residents and 6.0 acres of regional recreational sites and facilities per 1,000 residents, these are Citywide goals and are not intended to be requirements for individual development projects.

15 Student generation rates per household for residential uses are based on Table 3 of the LAUSD 2018 Developer Fee Justification Study: Elementary = 0.2269; Middle School = 0.0611; High School = 0.1296.

16 For the restaurant/retail uses, the student generation rate of 0.610 student per 1,000 square feet is based on the Neighborhood Shopping Centers rate as provided in Table 15 of the LAUSD 2018 Developer Fee Justification Study. The students are distributed as follows: 54 percent elementary school, 15 percent middle school, and 31 percent high school.

Thus, similar to the Project, operation of Alternative 2 would not exacerbate the existing shortfalls in parkland relative to City standards to the extent that new or physically altered park or recreational facilities would need to be constructed, the construction of which would cause significant adverse physical environmental impacts. Similar to the Project, impacts with respect to parks and recreation would be less than significant under Alternative 2. However, since Alternative 2 would generate substantially less population and demand for park space than under the Project, impacts would be less than the Project.

(v) Libraries

Alternative 2's residential population would increase demand for library services, as would occur under the Project. The LAPL has indicated they have no plans for a new branch library in the Project vicinity. As with the Project, there are also three libraries within one-mile of the of the Project Site which could serve Alternative 2. Furthermore, in consideration of the Project's ability to provide internet service, generate revenue to the City's General Fund, and LAPL's ongoing expansion and availability of online resources, similar to the Project, Alternative 2's increase in demand to any one local library would not be expected to result in a substantial increase in demand that would necessitate new or physically altered facilities. Therefore, similar to the Project, Alternative 2 would not create the need for new or physically altered library facilities, the construction of which would result in substantial adverse physical environmental impacts, in order to maintain acceptable service ratios or objectives. Therefore, as with the Project, impacts to libraries under Alternative 2 would be less than significant. However, because Alternative 2 would generate substantially less population, impacts relative to libraries would be less than the Project.

(h) Transportation

During operation, the Project and the Project with the East Site Hotel Option would have different overall VMT and VMT per capita statistics. However, both development scenarios would result in the same transportation-related impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of Alternative 2 apply to both the Project and the Project with the East Site Hotel Option.

(i) Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities

Alternative 2, as with the Project, would support multimodal transportation options and a reduction in VMT, as well as promote transportation-related safety in the Project area. Alternative 2, as with the Project, would not conflict with policies of Mobility Plan 2035 and the City of Los Angeles Complete Streets Design Guide,

adopted to protect the environment and reduce VMT. Similar to the Project, Alternative 2 would also be consistent with applicable transportation goals of the Hollywood Community Plan and the Hollywood Redevelopment Plan. Project Design Feature TRAF-PDF-1 under Alternative 2, as well as the Project, would implement a TDM Program to address parking, transit, commute trip reductions, shared mobility, bicycle use, and pedestrian access, and TDM management strategies. TDM measures to promote bicycle use include bicycle parking spaces, bike lockers, and showers for residents, employees, and visitors. Alternative 2, as with the Project, would not conflict with VisionZero to reduce traffic-related deaths; with LAMC Section 12.37 regarding street standards; with LADOT MPP, Section 321, regarding driveway design standards, or with the 1988 Hollywood Community Plan's Objective 6 to coordinate land use densities and to promote the use of transit. Alternative 2, as with the Project, would increase population density in close proximity to the Metro Red Line Hollywood/Vine Station, other regional Metro bus lines, and the LADOT DASH lines. Alternative 2, as with the Project, would also provide for road and pedestrian improvements, including a paseo linking the West Site and East Site and new median improvements along Vine Street, which would enhance pedestrian safety. A signalized mid-block crosswalk is proposed across Argyle Avenue to help facilitate local pedestrian circulation and access by maintaining a path of east-west travel with the existing mid-block crosswalks across Ivar Avenue and Vine Street. Similar to the Project, Alternative 2 would not conflict with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities and, as such, impacts relative to plans and programs would be less than significant and similar to the Project.

(ii) Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)

As required under CEQA Guidelines Section 15064.3(b) and based on proposed land uses, floor areas, and TDM measures incorporated under Project Design Feature TRAF-PDF-1 (Transportation Demand Management Program), would be applicable to Alternative 2, as well as the Project. Alternative 2 would have a household VMT of 4.8 per capita, and, similar to the Project, since it has less than 50,000 square feet of commercial floor area, work VMT per employee is not applicable.[17] In comparison, the Project would have a household per capita VMT of 4.8, and the Project with the East Site Hotel Option would have a household VMT of 4.7 per capita and a work VMT of 4.8. These rates are all below the thresholds of significance proposed for the City's Central APC household per capita of 6.0 and work VMT of 7.6. per employee. As per capita and worker VMT are below the APC thresholds, impacts with respect to CEQA Guidelines Section 15064(b) would be less than significant for Alternative 2, as with the Project.

17 Fehr and Peers, Alternatives Transportation Analysis, March 2020, Appendix R of this Draft EIR.

Further, as Alternative 2 would have the same household VMT per capita than the Project, impacts would be similar to the Project.

(iii) Design Hazards

Alternative 2, as with the Project, would reduce existing curb cuts and provide new sidewalks around the perimeter of the Project Site. As with the Project, improvements under Alternative 2 would include a signalized mid-block crosswalk provided across Argyle Avenue to help facilitate local pedestrian circulation and access. As with the Project, Alternative 2 would provide a paseo through the Project Site between Argyle Avenue and Ivar Avenue. Alternative 2, as with the Project, would eliminate driveway crossings on Vine Street. Access to the Capitol Records Complex (including both the Capitol Records Building and the Gogerty Building) would continue to be provided via the existing driveway on Yucca Street. Similar to the Project, total existing curb cuts would be reduced from 12 total to a total of five. The driveways would not require the removal or relocation of existing passenger transit stops and would be designed and configured to avoid potential conflicts with transit services and pedestrian traffic. Alternative 2, as with the Project, would not substantially increase hazards, vehicle/pedestrian conflict, or preclude City action to fulfill or implement projects associated with these networks. Similar to the Project, Alternative 2 would contribute to overall walkability through enhancements to the Project Site, streetscape, and crossing of Argyle Avenue, and would not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. Impacts under Alternative 2 would be less than significant and similar to the Project.

(iv) Emergency Access

The Project Site is located in an established urban area served by the surrounding roadway network, and multiple routes exist in the area for emergency vehicles and evacuation. Drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Similar to the Project, no policy or procedural changes to an existing risk management plan, emergency response plan, or evacuation plan would be required due to implementation under Alternative 2. All driveways and the internal circulation would be subject to LAFD review to confirm adequate access is provided internally for on-site emergency vehicle access. With review and approval of Project Site access and circulation plans by the LAFD, Alternative 2, as with the Project, would not impair implementation of or physically interfere with adopted emergency response or emergency evacuation plans. Impacts regarding emergency access under Alternative 2 would be less than significant and similar to the Project.

(i) Tribal Cultural Resources

As tribal cultural resources impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparison of

impacts of Alternative 2 apply to both the Project and the Project with the East Site Hotel Option.

The City complied with AB 52 in its consultation and records searches conducted through SCCIC and the NAHC for the Archaeological and Paleontological Resources Assessment. The research indicated no known tribal cultural resources within the Project Site or surrounding area. However, as with the Project, excavations associated with Alternative 2 could have a potential, albeit a low potential, to encounter previously unknown and buried tribal cultural resources. However, similar to the Project, in the event that buried tribal cultural resources are encountered during construction under Alternative 2, the Project Applicant will be required to comply with the City's standard Conditions of Approval for the treatment of inadvertent Tribal cultural resource discoveries. With compliance, Alternative 2, as with the Project, would result in less-than-significant impacts to tribal cultural resources. However, because Alternative 2 would require less excavation, impacts would be less than the Project.

(j) Utilities and Service Systems – Water, Wastewater, and Solid Waste

During operation, the Project and the Project with the East Site Hotel Option would have different utility demand statistics (i.e., water demand, wastewater generation, and solid waste generation). However, both development scenarios would result in the same impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of Alternative 2 apply to both the Project and the Project with the East Site Hotel Option.

(i) Wastewater

Alternative 2 would generate additional wastewater and increase demand on the existing Hyperion Treatment Conveyance System and Hyperion Treatment Plant. **Table V-3**, *Alternative 2 Wastewater Generation During Operation*, summarizes Alternative 2's approximate wastewater generation. Table V-3 assumes that 45 percent of Alternative 2's 384 residential units would be one-bedroom, 40 percent would be two-bedroom units, and 15 percent would be three-bedroom, and that indoor amenities, spa/health club, retail/restaurant space, and swimming pool areas would be similar to those of the Project.

TABLE V-3
ALTERNATIVE 2 WASTEWATER GENERATION DURING OPERATION

Land Use	Units	Generation Rate (gpd/unit)[a]	Total Wastewater Generation (gpd)
Residential: Apartment – 1 Bedrooms	173 du	110/du	19,030
Residential: Apartment – 2 Bedrooms	153 du	150/du	22,950
Residential: Apartment – 3 Bedrooms	58 du	190/du	11,020
Retail/Restaurant Lobbies	16,882 sf	50/1,000 sf	844
Retail/Restaurant: Full Service Indoor Seat[b]	1,232 seats	30/seat	36,960
Indoor Amenities[c]	23,916 sf	50/1,000 sf	1,196
Health Club/Spa	9,337 sf	650/1,000 sf	6,069
Swimming Pools[d]	10,165 cf	7.4805/cf	76,039
Cooling Towers	7,971 sf	170/1,000 sf	1,355
		Total	**175,463 gpd**

Acronyms: du = dwelling units; sf = square feet, gpd = gallons per day, cf = cubic feet

[a] The generation rates are based on the LASAN sewerage generation factors.

[b] To calculate the number of seats, 1 seat per 15 sf of dining area (or (or 1 seat per 24.5 sf)) was assumed. To be conservative, the calculation assumes the Alternative's entire retail/restaurant floor area of 30,176 sf would be restaurant uses.

[c] The lounge use includes would include a library, multipurpose rooms, kid rooms, and general amenity space.

[d] Based on two moderate-sized swimming pools.

SOURCE: ESA, 2020.

As shown in Table V-3, Alternative 2 is estimated to generate approximately 175,463 gpd, or approximately 0.175 mgd.[18] In comparison, the Project is estimated to increase on-site wastewater generation by 311,680 gpd, or approximately 0.312 million mgd and the Project with the East Site Hotel Option is anticipated to generate 322,067 gpd, or approximately 0.322 mgd. These estimates do not account for reductions in wastewater generation that would occur with implementation of conservation measures. Similar to the Project, the increase in wastewater generation by Alternative 2 would be within the capacity limits of the conveyance and treatment facilities serving the Project Site. Similar to the Project, impacts on wastewater conveyance and treatment systems under Alternative 2 would be less than significant. However, because Alternative 2 would generate a

18 As shown in Table V-3, the total amount of wastewater generation for swimming pools is 76,039 gpd. This circumstance would occur only if the swimming pools were all drained on any given day. Daily wastewater generation for the swimming pools would typically be less than approximately 500 gallons per day. As such, this analysis is conservative in presenting the maximum wastewater generation scenario for swimming pools.

substantially lower volume of wastewater, impacts under Alternative 2 would be less than the Project.

(ii) Water Supply

Alternative 2 would increase demand on water supplies and infrastructure. Based on wastewater generation factors shown in Table V-3, residential, commercial, and recreational uses provided under Alternative 2 would generate a maximum day water demand of 175,463 gpd, which includes water demand from draining the pools entirely. However, draining the pools would occur very infrequently and on average over the course of a year, pool–related water demand would average less than approximately 500 gallons per day. Thus, the water demand analysis below is based on this average pool daily water demand to provide a reasonable assessment of yearly water demand. Additional water would be required for landscaping and indoor parking structure space. Alternative 2, as with the Project, would require approximately 2,227 gpd for landscaping. With smaller parking structures, Alternative 2's indoor parking space would be reduced and is assumed to require approximately half the water required by the Project's indoor parking, or approximately 223 gpd of water. Alternative 2's total new water maximum daily demand is estimated to be approximately 177,913 gpd prior to water conservation measures. Water conservation measures under the City's Ordinance No. 184,248, the 2017 Los Angeles Plumbing Code, and the 2017 Los Angeles Green Building Code, and implementation of the Applicant's water conservation efforts and Project Design Feature WS-PDF-1 would result in a savings of approximately 39 percent (as assumed for the Project as well and excludes swimming pool reduction). Assuming a water demand of 500 gallons per day for the swimming pool, Alternative 2's average daily water demand would be would typically be less than approximately 62,643 gpd [70 acre-feet per year (afy)].[19]

In comparison, the Water Supply Assessment for the Hollywood Center Project indicated the Project and the Project with the East Site Hotel Option would have a water demand of 163,098 gpd (~183 afy) and 182,896 gpd (~205 afy), respectively, accounting for water conservations and compliance with applicable regulations.[20] Similar to the Project, Alternative 2's water demand projections would be within LADWP's 2015 UWMP's projected increases in Citywide water demands, while anticipating multi-dry year water conditions through the planning horizon of 2040.

Furthermore, similar to the Project, operation of Alternative 2 would require new connections from existing facilities. With regulatory compliance to the LAMC and coordination with LADWP, operation of Alternative 2, as with the Project, would not result in the relocation or construction of new or expanded water facilities, the

19 Alternative 2 Land Uses from Table V-3 excluding pools (99,424 gpd) + Landscaping (2,227 gpd) + Indoor Parking (223 gpd) = 101,874 gpd. Then, 61% X 101,874 gpd = 62,143 gpd. Then, 62,143 gpd + 500 gpd (pools) = 62,643 gpd.

20 LADWP, WSA for the Hollywood Center Project, December 11, 2018, pp. 11 and 12. Provided in Appendix P-2 of this Draft EIR.

construction or relocation of which would cause significant environmental effects. Similar to the Project, operational impacts on water infrastructure under Alternative 2 would be less than significant.

Based on the above, while Alternative 2 and the Project would result in less than significant water supply and infrastructure impacts, because Alternative 2 would result in less average daily water demand, impacts would be less under Alternative than the Project.

(iii) Solid Waste

Alternative 2, as with the Project, would increase solid waste generation at the Project Site that would need to be landfilled. Construction of the Project would generate an estimated 691,269.18 gross tons of construction and demolition (C&D) waste. Alternative 2 would reduce this total because of approximately 62.7 percent less floor area (480,516 square feet under Alternative 2 compared to 1,287,150 square feet under the Project,[21] and reduced excavation for the subterranean parking structure. The maximum construction waste under the Project would represent a small fraction of the available capacity of the County's Azusa Land Reclamation landfill or one of the inert debris engineered fill operations in Los Angeles County. As such, impacts associated with solid waste during construction under Alternative 2, as with the Project, would be less than significant. However, because construction solid waste would be less under Alternative 2, it would have less impact with respect to construction solid waste than the Project.

During operation, Alternative 2's 384 residential uses would generate approximately 4,734 pounds of solid waste per day (based on 12.33 pounds per day per unit) or approximately 864 tons per year. The retail/restaurant uses, which are the same as under the Project, would generate approximately 2,159 pounds per day, or 394 tons per year. Before diversion, Alternative 2 would generate approximately 6,893 pounds per day or 1,258 tons per year. After implementation of the City's 65-percent diversion rate, Alternative 2 would generate approximately 440.3 tons of solid waste per year or 1.20 tons per day (tpd). The Sunshine Canyon Landfill, the primary recipient of Class III solid waste from the City, has a maximum daily capacity of 12,100 tpd and a disposal rate of 6,765 tpd, indicating a residual daily capacity of 5,335 tpd. Alternative 2's addition of 1.41[22] tpd landfill disposal rate would represent 0.02 percent of Sunshine Canyon's residual daily capacity, assuming diversion.

By comparison, the Project, which would have a higher disposal rate than the Project with the East Site Hotel Option, would generate approximately 2,639 tons

21 The Project with the East Site Hotel Option would provide 1,277,741 square feet of total floor area.

22 Daily disposal in tons for Alternative 2 assumes that landfills operate six days per week; 52 weeks * 6 days = 312 days. Therefore, the daily disposal is calculated by 440.3 tons / 312 days = 1.41 tpd.

of solid waste requiring landfill disposal per year and approximately 7.23 tons of solid waste per day. After implementation of the City's 65 percent diversion rate, the Project would generate approximately 923.65 tons of solid waste per year or 2.53 tons of solid waste per day, which would be 2.96 tpd landfill disposal rate.

Similar to the Project, Alternative 2's additional solid waste generation would be accommodated by the County's City-certified waste processing facilities. As with the Project, Alternative 2's 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. Similar to the Project, impacts with respect to solid waste under Alternative 2 would be less than significant. However, because Alternative 2 would reduce solid waste compared to the Project, impacts under Alternative 2 would be less than the Project.

(k) Energy Conservation and Infrastructure

During operation, the Project and the Project with the East Site Hotel Option would have different energy consumption statistics. However, both development scenarios would result in the same impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of Alternative 2 apply to both the Project and the Project with the East Site Hotel Option.

(i) Efficient Energy Consumption

As with the Project, Alternative 2 would incorporate energy-conservation measures beyond regulatory requirements as specified in Project Design Features GHG-PDF-1 and WS-PDF-1. These require USGBC LEED Gold Certification energy performance optimization features such as reducing building energy cost by a minimum of 11.6 percent for new construction compared to the 2019 Title 24 Building Energy Efficiency Standards and installing energy efficient appliances. As with the Project, Alternative 2 would comply with and exceed existing minimum energy efficiency requirements such as the Title 24 standards and CALGreen Code, including for building rooftops to be solar-ready so that on-site solar photovoltaic or solar water heating systems could be installed in the future. Alternative 2, as with the Project, would be designed to exceed American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) 90.1-2010 standards by more than 20 percent through the use of efficient heating, ventilation, and air conditioning (HVAC) systems and a high-performance building envelope. Indoor air quality would be enhanced through the selection of low-volatile organic compound (VOC) emitting materials, and exhaust systems would be utilized for optimal ventilation in both kitchens and bathrooms. Alternative 2, as with the Project, would meet the requirements of the Los Angeles Green Building Code and the CALGreen Code regarding on-site renewable energy sources.

Alternative 2, as with the Project, would result in energy consumption reductions as they are mixed-use developments located on an urban infill site that would

achieve LEED Gold Certification. Alternative 2, as with the Project, would be consistent with and not conflict with the SCAG's land use type for the area and would encourage alternative transportation, and achieve a reduction in VMT resulting in a transportation efficiency level better than the Hollywood neighborhood and City and statewide average. Section IV.O, *Energy Conservation and Infrastructure*, of this Draft EIR concludes that the Project's energy requirements would not substantially affect local and regional supplies or capacity during construction or operation, and that the Project would not cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation and, as such, impacts related to efficient energy consumption would be less than significant. With its reduction in floor area of approximately 62.7 percent compared to the Project, Alternative 2 would generate a lower level of energy demand than would the Project. Thus, impacts related to efficient energy consumption as with the Project would be less than significant and, because the scale of development would be less, impacts with respect to energy consumption would be less than the Project.

(ii) Conflict with Plans for Renewable Energy or Energy Efficiency

As with the Project, Alternative 2 would comply with existing energy standards, would include a project design and building operation that would incorporate energy-conservation measures beyond those otherwise required, and would not conflict with adopted energy conservation plans. Alternative 2, as with the Project, would be designed to meet the USGBC LEED Gold Certification including energy performance optimization features, such as reducing building energy demand by a minimum of 11.6 percent for new construction compared to the 2019 Title 24 Building Energy Efficiency Standards. Among other features it would install energy efficient appliances that meet the USEPA ENERGY STAR rating standards or equivalent; incorporate heat island reduction strategies, such as high-reflectance and vegetated roofs for the Project roof areas; provide water efficient fixtures and landscaping to reduce indoor water usage; and provide an HVAC system that would be sized and designed in compliance with the CALGreen Code to maximize energy efficiency caused by heat loss and heat gain. Alternative 2, as with the Project, would have the same automobile fuel efficiencies associated with access to alternative modes of transportation.

By exceeding the regulatory standards, similar to the Project, Alternative 2 would have a less-than-significant impact regarding the provisions of plans for renewable energy and energy efficiency. As with the Project, the impact of Alternative 2 with respect to compliance with renewable energy and energy efficiency would be less than significant. As Alternative 2 would be in compliance with plans for renewable energy and energy efficiency, impacts under Alternative 2 would be similar to the Project.

(iii) Relocation or Expansion of Energy Infrastructure

Alternative 2, as with the Project, would utilize energy infrastructure to accommodate their respective demand for energy resources. Similar to the Project, Alternative 2's electricity and natural gas demands are expected to represent a small fraction of LADWP and SoCalGas energy supplies and the service provider's existing infrastructure. As concluded in Section IV.O, *Energy Conservation and Infrastructure*, of this Draft EIR, planned electricity and natural gas supplies would be sufficient to meet the Project's demand for electricity and natural gas. As with the Project, Alternative 2 would not result in an increase in demand for electricity or natural gas services that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Similar to the Project, impacts with respect to the relocation or expansion of energy infrastructure under Alternative 2 would be less than significant. As off-site energy infrastructure would accommodate energy demand under Alternative 2, impacts would be similar to the Project.

(3) Relationship of the Alternative to Project Objectives

As described above, Alternative 2, the Development under Existing Zoning Alternative, would consist of two mixed-use buildings rising to 18 stories on the East Site and 14 stories on the West Site. Proposed land uses include 384 market rate residential units and 30,176 square feet of retail/restaurant uses. Alternative 2 would not provide senior affordable residential units and would reduce the Project's total floor area by approximately 62.7 percent. Alternative 2 would include 36,141 square feet of publicly accessible open space and a paseo running between Argyle Avenue and Ivar Avenue.

Alternative 2 would maintain views of the Capitol Records Building through building setbacks and the open paseo, running between Ivar Avenue and Argyle Avenue. It would also be constructed to meet LEED-Gold equivalent standards. As such, it would be fully consistent with the following Project Objectives:

1. Redevelop the Project Site, with a mixed-use development that protects the architectural and historical heritage of the Capitol Records Complex and activates Hollywood Boulevard, Vine Street, and surrounding streets through connected, publicly available landscaped open space, including a paseo with shopping, seating, open air dining, and art installations, and plazas accommodating performances and community focused events.

2. Create a hub of activity surrounding the Capitol Records Complex and the intersection of Hollywood Boulevard and Vine Street, by activating the eastern end of Hollywood Boulevard and the terminus of the Hollywood Walk of Fame, to increase engagement with the Capitol Records Complex.

3. Develop architecturally distinct buildings that are compatible with the Capitol Records Complex through a design that responds to the Capitol Records Building's modernist architectural character, and preserve views of the Capitol Records Building.

9. Activate the Hollywood area with commercial opportunities that could serve local employees, generate local tax revenues, and provide new permanent jobs and housing for residents in support of local business.

10. Incorporate sustainable and green building design and construction to promote resource conservation, including waste reduction, efficient water management techniques, and conservation of energy to achieve a LEED-Gold equivalent building.

Although Alternative 2 would provide for mixed use development, it would not maximize infill development, cluster jobs and housing near transit, create jobs in both Project construction and operation, or activate the Hollywood area to the same extent as under the Project. In addition, Alternative 2 would reduce the Project's setback between the Capitol Records Building and the East Building and would comparatively constrain views of the Capitol Records Building compared to the Project. As such, it would not meet the following objectives to the same extent as under the Project and is, thus, considered to be only partially consistent with the following objectives:

4. Maintain prominent views of the Capitol Records Building by providing building setbacks, visual buffers, open space between the Project's new buildings and the Capitol Records Complex, and safe public viewing areas from the proposed paseo and plazas, to maximize view corridors and continue showcasing its distinctive architectural design.

5. Promote local, regional, and State land use and mobility objectives and reduce vehicle miles traveled (VMT) by maximizing infill development within an existing Regional Center near jobs, retail, and entertainment in proximity to transit and transportation infrastructure that encourages pedestrian activity.

7. Cluster jobs and housing near transit by locating a high-density, mixed-use development within a Transit Priority Area.

8. Support the growth of the City's economic base through the introduction of an economically viable project which creates a significant number of construction and permanent jobs.

Alternative 2 would not include senior affordable residential units and, as such, would not meet the following objective:

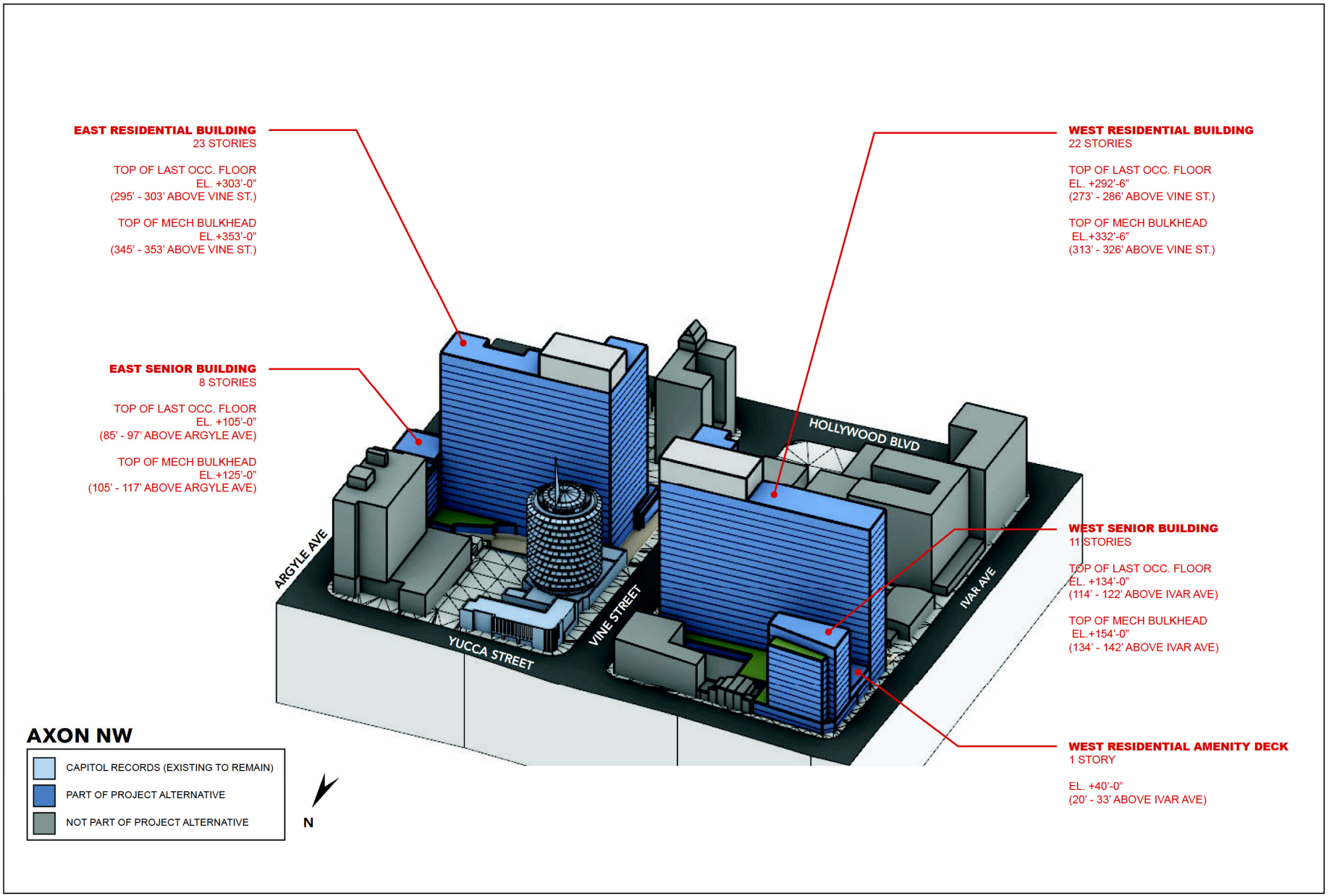
6. Provide affordable senior housing with outdoor spaces in proximity to public transportation, allowing an age-specific demographic to continue to live in their residence of preference while maintaining access to services and goods.

c) Alternative 3: Reduced Maximum Height Alternative

(1) Description of the Alternative

Development under the Reduced Maximum Height Alternative (Alternative 3) would limit maximum building heights to 23 stories on the East Site and 22 stories on the West Site. Alternative 3 would incorporate 30,176 square feet of retail and restaurant uses distributed over the East and West Sites. Alternative 3 would provide both market-rate and senior affordable housing as under the Project but at a reduced number to reflect the incremental reduction in floor area. Alternative 3 would provide 349 market-rate units and 53 senior affordable units on the East Site and 478 market-rate units and 72 senior affordable units on the West Site, for a total of 827 market-rate units and 125 senior affordable units. As shown in **Figure V-4**, *Building Massing for Alternative 3*, this Alternative's residential component would be provided within four buildings, two each on the East Site and West Site, respectively. The East Building would reach a height of 303 feet at the top of the 23rd story and 353 feet at the top of the bulkhead. The West Building would be 22 stories and reach a height of 292.5 feet at the top of the 22nd story and 332.5 feet at the top of the bulkhead. The East Senior Building would be eight stories and would reach a height of 105 feet at the top of the 8th story and 125 feet at the top of the bulkhead. The West Senior Building would be 134 feet at the top of the 11th story and reach a maximum height of 154 feet at the top of the bulkhead. Alternative 3 would be developed with a total of 35,664 square feet of publicly accessible open space at the ground level, which would form a paseo through the East Site and a plaza accessible from Vine Street on the West Site. No performance stage would be located within the paseo off of Vine Street on the East Site. The total new floor area for Alternative 3 would be approximately 1,097,466 square feet, which would result in an FAR of 6.031:1, and represent an approximate 14.7-percent reduction in the Project's floor area. A five-level subterranean parking structure containing 684 spaces would be provided on the East Site, and a five-level subterranean parking structure containing 699 parking spaces would be provided on the West Site, for a total of 1,383 parking spaces. Vehicle and bicycle parking would be provided to in accordance with LAMC requirements.

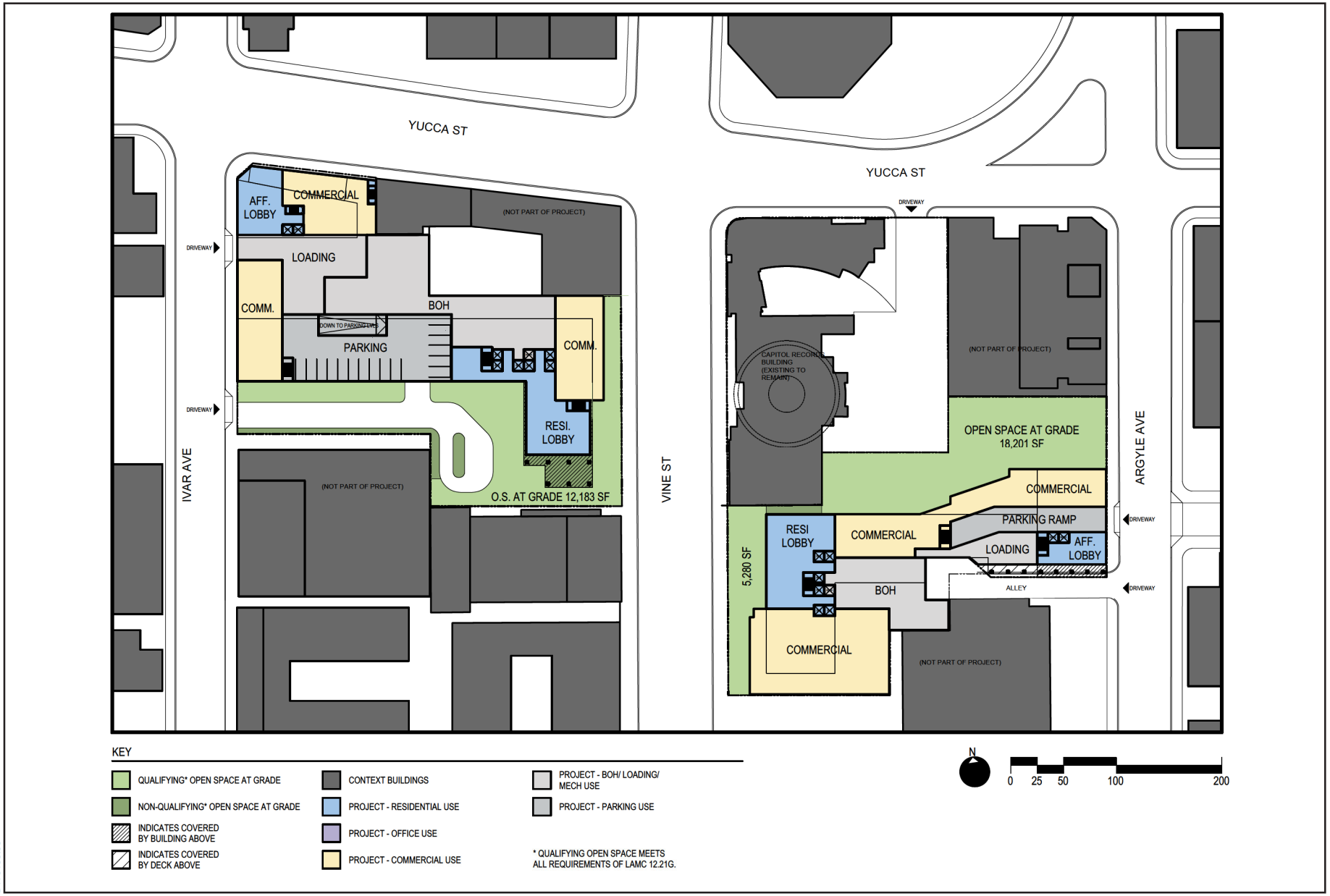
Alternative 3 would result in shorter buildings with broader footprints and would, thus, reduce the Project's building setbacks. **Figure V-5**, *Alternative 3 Ground Floor Plan*, illustrates the uses and open space at the ground level, and **Figure V-6**, *Alternative 3 Building Footprints*, illustrates the location of proposed residential buildings relative to the proposed ground level uses. The components of Alternative 3 are compared to those of the Project in **Table V-4**, *Comparison of Alternative 3 to the Project*, below.



SOURCE: Handel Architects, 2019

Hollywood Center Project

Figure V-4
Building Massing for Alternative 3

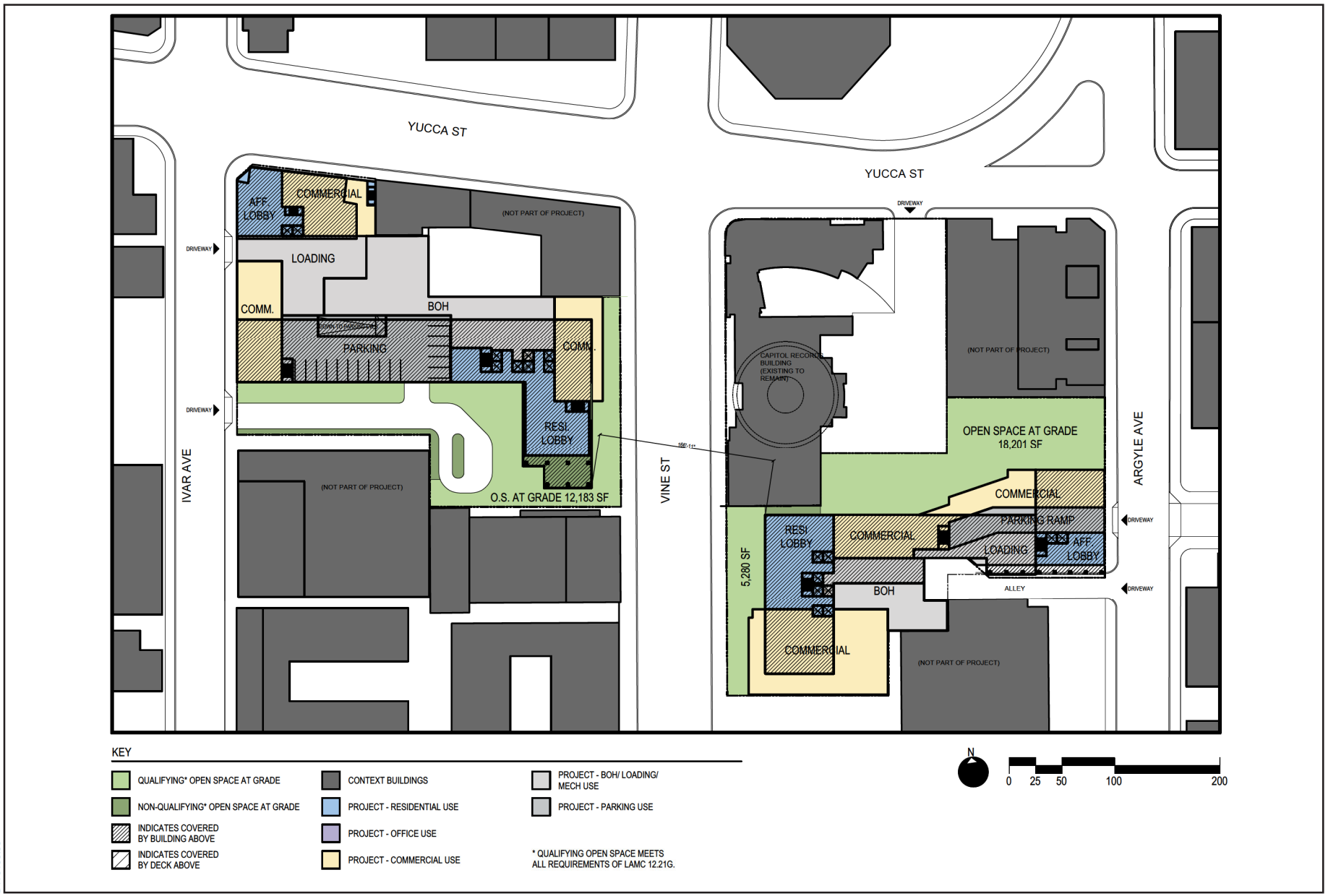


D170105.00

SOURCE: Handel Architects, 2020

Hollywood Center Project

Figure V-5
Alternative 3 Ground Floor Plan



D170105.00

SOURCE: Handel Architects, 2020

Hollywood Center Project

Figure V-6
Alternative 3 Building Footprints

TABLE V-4
COMPARISON OF ALTERNATIVE 3 TO THE PROJECT

Component	Project	Project With the East Site Hotel Option	Alternative 3
Publicly Accessible Open Space	33,922 sf	33,922 sf	35,664 sf
East Site	24,990	24,990 sf	23,481 sf
West Site	8,932 sf	8,932 sf	12,183 sf
Maximum Building Height			
East Site	46 stories, 595 feet	46 stories, 595 feet	23 stories, 353 feet
West Site	35 stories, 469 feet	35 stories, 469 feet	22 stories, 332.5 feet
Market-Rate Units Total	872 du	768 du	827
East Site	423 du	319 du	349 du
West Site	449 du	449 du	478 du
Project Affordable Units Total	133 du	116 du	125 du
East Site	65 du	48 du	53 du
West Site	68 du	68 du	72 du
Maximum Building Height Senior Buildings			
East Site	11 stories, 149 feet	9 stories, 131 feet	8 stories, 125 feet
West Site	11 stories, 155 feet	11 stories, 155 feet	11 stories, 154 feet
Hotel	N/A	220 rooms	N/A
Retail and Restaurant Floor Area Total	30,176 sf	30,176 sf	30,176 sf
East Site	17,485 sf	17,485 sf	17,485 sf
West Site	12,691 sf	12,691 sf	12,691 sf
Total New Floor Area	1,287,150 sf	1,277,741 sf	1,097,466 sf
East Site	638,407 sf	623,997 sf	466,436 sf
West Site	648,793 sf	648,744 sf	631,031sf
Vehicle Parking	1,521 spaces	1,521 spaces	1,383 spaces
East Site	684 spaces	684 spaces	684 spaces
West Site	837 spaces	837 spaces	699 spaces
FAR[a]	6.973:1	6.901:1	6.031:1

[a] The calculated FAR includes new floor area in addition to the floor area of the Capitol Records and Gogerty Buildings (114,303 sf).

SOURCE: ESA, 2020.

(2) Environmental Impacts

(a) Aesthetics

SB 743 (codified in PRC Section 21099(d)(1)) and ZI File No. 2452 provide that a mixed-use or employment center project in a designated TPA site and infill area is not required to evaluate physical aesthetic impacts pertaining to scenic vistas, scenic resources, and light and glare in an EIR. Although the Project and this Alternative meet these criteria, for disclosure purposes only, information based on City thresholds is provided relative to scenic vistas, scenic resources, and light and glare.

As aesthetics impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 3 apply to both the Project and the Project with the East Site Hotel Option.

(i) Scenic Vistas

Alternative 3 would involve the construction of two new mixed-use high-rise buildings, including a 22-story building rising 332.5 feet at the top of the bulkhead on the West Site and a 23-story building rising 353 feet at the top of the bulkhead on the East Site. In addition, an 11-story West Senior Building would be constructed in the West Site and an eight-story East Senior Building would be constructed in the East Site. Construction and operation of Alternative 3 would affect public views across the existing surface parking lots and views of scenic elements within the Project Site. As with the Project, a construction fence will be erected along the periphery of the Project Site, including Vine Street (required under Project Design Feature AES-PDF-1), which would temporarily block views of the "Hollywood Jazz: 1945-1972" mural. Construction activities would also require the temporary removal of a portion of the Hollywood Walk of Fame. However, construction would be temporary and would not have a permanent substantial adverse effect on views of these features. As with the Project, the West Site's high-rise building would block some passing views of the historic Knickerbocker sign from the Hollywood Freeway. However, similar to the Project, because of the continuous movement of traffic and availability of other freeway views to the sign, the effect on this freeway view is not considered a substantial adverse effect of Alternative 3.

There are no existing significant panoramic views across the Project Site of the historic Hollywood Sign from adjacent streets or other public areas. Public views of broader scenic resources, such as the mountains and the Hollywood Sign through other street corridors, would continue to be available and would not be affected by construction or operation of Alternative 3. As with the Project, Alternative 3 would block some intermittent views of the historic Capitol Records Building from sections of Ivar Avenue, Hollywood Boulevard, and Argyle Avenue.

During construction and operation of Alternative 3, as with the Project, the Capitol Records Building would continue to be visible from more prominent view locations, such as the Hollywood Hills and the intersection of Hollywood Boulevard and Vine Street, or other sections along local streets. As with the Project, Alternative 3 would provide viewing opportunities of the Capitol Records Building from a new public paseo through the East Site and a plaza accessible from Vine Street on the West Site. As the East Site Senior Building would not be constructed, a broader view of the Capitol Records Building would be available through the paseo from Argyle Avenue than under the Project. As with the Project, the East Site high-rise would be set back from Vine Street to allow views of the Capitol Records Building from the intersection of Hollywood Boulevard and Vine Street. As with the Project, Alternative 3 would not result in substantial adverse effects on scenic vistas. Therefore, when compared to the Project, the effects on scenic vistas under Alternative 3 would be similar to the Project.

(ii) Scenic Resources

Impacts to on-site scenic resources, such as the on-site Capitol Records Building, the "Hollywood Jazz: 1945-1972" mural, the adjacent Hollywood Walk of Fame, and existing street trees, under Alternative 3 would be the same as the Project. Similar to the Project, construction vehicles and other construction activity on or adjacent to the Vine Street sidewalk under Alternative 3 would potentially impact the Hollywood Walk of Fame. However, as with the Project, implementation of Mitigation Measure CUL-MM-1 would ensure protection and temporary removal of the bronze and terrazzo Hollywood Walk of Fame stars and reduce impacts to less-than-significant. As with the Project, Alternative 3 would replace removed street trees with similar species and plant additional trees within the Project Site's open space areas, including the paseo, in accordance with the requirements of the LAMC and the City's Urban Forestry Division's requirements (currently requiring street tree replacement on a 2:1 basis). In addition, similar to the Project, Alternative 3 would preserve the "Hollywood Jazz: 1945-1972" mural. Overall, similar to the Project, Alternative 3 would not substantially damage scenic resources. As with the Project, Alternative 3 would implement measures to ensure the Hollywood Walk of Fame is protected and that no physical changes to nearby scenic resources or historic buildings would occur. Therefore, when compared to the Project, the effects on scenic resources under Alternative 3 would be similar to the Project

(iii) Regulations Governing Scenic Quality

CEQA Appendix G addresses whether a project in an urban area would conflict with regulations that govern scenic quality, such as those applicable to street trees, exterior lighting, signage, and compliance with applicable policies of the General Plan or Community Plan. As with the Project, Alternative 3 would replace street trees and provide exterior lighting in compliance with LAMC regulations and would comply with signage regulations set forth under the HSSUD. In addition, similar to

the Project, Alternative 3 would not conflict with Objective 7 of the Hollywood Community Plan, which requires the preservation of open space and promotes the preservation of views, natural character and topography of mountainous parts of the Hollywood community. The Project Site is visible from the Mulholland Scenic Parkway's Hollywood Bowl Overlook, an area with broad open space views in the Hollywood Hills. As with the Project, Alternative 3 would not adversely affect views from this open space area and, as such, would be consistent with Objective 7 of the Community Plan to preserve views. Therefore, similar to the Project, Alternative 3 would not conflict with the LAMC, HSSUD, or the applicable Community Plan open space policy. As with the Project, impacts under Alternative 3 would be less than significant. As Alternative 3 would also comply with regulations governing scenic quality, impacts under Alternative 3 would be similar to the Project.

(iv) Light and Glare

As with the Project, Alternative 3 would introduce new lighting, including temporary construction lighting, wayfinding lights, security lighting, landscape lighting, street-level commercial signs, paseo lighting, architectural accent lighting, and interior lighting visible through windows, all of which would be installed pursuant to LAMC lighting requirements. Architectural lighting would be provided at the top of the new buildings, as under the Project. In combination with the Capitol Records Building, any architectural lighting and signage would be consistent with HSSUD policy encouraging illuminated signage to reflect a modern, vibrant image of Hollywood. However, as with the Project, no still or moving images would be projected onto the buildings. Project Design Feature AES-PDF-3 would ensure that glass used in building façades will be anti-reflective or treated with an anti-reflective coating in order to minimize glare. Project Design Feature AES-PDF-4 would require that construction and operational lighting be shielded and directed downward (or on the specific on-site feature to be lit) in such a manner so as to avoid undue glare or light trespass onto adjacent uses. Similar to the Project, the incorporation of Project Design Features and LAMC requirements in Alternative 3 would ensure that potential light and glare would not adversely affect day or nighttime views. However, Alternative 3 would result in smaller buildings and reduced scale of lighting compared to the Project and, as such, light and glare effects would be less than the Project.

(b) Air Quality

Daily air quality construction emissions would be similar under the Project and the Project with the East Site Hotel Option. While the Project and the Project with the East Site Hotel Option would have nominally different daily operational emissions, the impact conclusions, significance levels, and mitigation measures are the same for the Project and the Project with the East Site Hotel Option. Accordingly, the below comparisons of impacts of Alternative 3 apply to both the Project and the Project with the East Site Hotel Option.

(i) Conflict with an Air Quality Management Plan

Similar to the Project, Alternative 3 would include new development on the Project Site that would generate new criteria pollutant emissions. Similar to the Project, Alternative 3 would be consistent with the goals of SCAG's 2016-2040 RTP/SCS and growth projections in the 2016 AQMP, since the growth would occur in a HQTA and a TPA. As with the Project, Alternative 3 would be consistent with the AQMP in its incorporation of appropriate control strategies for emissions reduction during construction and operation. In addition, Alternative 3 would also be consistent with applicable goals, objectives, and policies of the Air Quality Element of the General Plan that support and encourage pedestrian activity in the Hollywood area and uses that contribute to a land use pattern addressing housing needs while reducing vehicle trips and air pollutant emissions within a TPA. For all of these reasons, impacts under Alternative 3 with respect to consistency with air quality management plans would be less than significant and similar to the Project.

(ii) Cumulative Increase in Criteria Pollutants/Violation of Air Quality Standards

(a) Construction

As with the Project, Alternative 3's construction phases have the potential to generate emissions that would exceed SCAQMD air quality standards through the use of heavy-duty construction equipment, construction traffic, fugitive dust emissions, paving operation, and the application of architectural coatings and other building materials. The maximum emissions under Alternative 3 would be similar to the Project because emission levels are based on a single day in which maximum construction activity would occur. Similar to the Project, with incorporation of Mitigation Measure AQ-MM-1 which would require the use of diesel-powered construction equipment that meet USEPA Tier 4 Final off-road emissions standards; use of pole electricity or alternative energy to power electric tools, equipment, and lighting; maintenance and operation of construction equipment to minimize exhaust emissions; and incorporation of Project Design Feature GHG-PDF-1 (Green Building Features), construction emissions under Alternative 3 would not exceed SCAQMD numerical significance thresholds. Similar to the Project, because Alternative 3's construction emission levels would be below the applicable numerical significance thresholds, emissions related to air quality standards would be less than significant. Alternative 3 would reduce the Project's scale of development by approximately 14.7 percent and, thus, would reduce overall construction duration. As Alternative 3 would reduce construction duration, impacts with respect to cumulative increases in criteria pollutants and violations of air quality standards would be less than the Project.

(b) Operation

During operation, Alternative 3 would generate emissions associated with vehicle trips, heating, lighting, other electric and natural gas power requirements,

emergency generators, and architectural coatings. Similar to the Project, Alternative 3 would incorporate Project Design Feature GHG-PDF-1 (Green Building Features) and would comply with SCAQMD Rule 1113 regarding architectural coatings.

NOx emissions would be 76 and 79 pounds per day for the Project and the Project with the East Site Hotel Option, respectively. The daily impact threshold for NOx is 55 pounds per day. Despite the reduction in land use intensity and traffic under Alternative 3, daily operational NOx emission exceedances would occur under Alternative 3 as it would require a sizeable generator, and its collective NOx generating sources are expected to be above 55 pounds per day. Alternative 3 would implement the same Mitigation Measure AQ-MM-2 as the Project to reduce operational NOx levels to a less-than-significant level.

As Alternative 3 would be less intense and have less traffic than the Project, its operational daily emissions would not exceed the SCAQMD numerical significance thresholds for VOC, CO, SOx, PM10 and PM2.5. Thus, as with the Project, impacts would be less than significant under Alternative 2 for these criteria pollutants. However, because of its reduced emissions, impacts under Alternative 2 with respect to cumulative increases in criteria pollutants and violations of air quality standards would be less than Project.

(iii) Exposure of Sensitive Receptors to Pollutant Concentrations

(a) Localized Emissions

As with the Project, Alternative 3 would generate localized emissions during construction and operation. It can be expected that maximum daily localized construction emissions would be similar to the Project. However, because of its smaller scale and intensity, localized operational emissions under Alternative 3 would be less than the Project. As with the Project, maximum localized emissions associated with grading and architectural coatings during construction and charbroilers, landscaping, coatings, and use of consumer products, and other sources at sensitive receptors would be below the localized screening thresholds for NO_X, CO, PM10, and PM2.5, including at the nearest receptors adjacent to the Project Site. Therefore, similar to the Project, with respect to localized construction and operational emissions, impacts to sensitive receptors would be less than significant under Alternative 3. Alternative 3 would reduce the scale of the Project, the duration of construction, and building floor area compared to the Project. The reduction in building floor area and reduced occupancy of the Project Site under Alternative 3 would reduce daily operational localized emissions from less building energy demand, consumer product usage, and architectural coatings usage. Accordingly, impacts under Alternative 3 with respect to localized emissions would be less than the Project.

(b) Carbon Monoxide Hotspots

Vehicle trips would be less under Alternative 3 than the Project. As such, as with the Project, Alternative 3 would not cause or contribute considerably to the formation of CO hotspots and impacts would be less than significant. However, because Alternative 3 would reduce the Project's daily vehicle trips, impacts would be less than the Project.

(c) Toxic Air Contaminants

(i) Construction

Under Alternative 3, as with the Project, temporary TAC emissions associated with DPM emissions from heavy construction equipment would occur during construction activities. Mitigation Measure AQ-MM-1 would require utilization of off-road diesel-powered construction equipment that meets or exceeds the most stringent and environmentally protective CARB and USEPA Tier 4 off-road emissions standards. The Tier 4 standards would reduce DPM emissions by approximately 81 to 96 percent compared to equipment that meet the Tier 2 off-road emissions standards. As with the Project, with implementation of the required mitigation, Alternative 3 would not expose sensitive receptors to substantial TAC concentrations, and impacts would be less than significant. However, because Alternative 3 would reduce the scale and duration of construction activities, impacts under Alternative 3 would be less than the Project.

(ii) Operation

Alternative 3, as with the Project, would use consumer products and architectural coatings or involve other sources, such as charbroiling associated with restaurant uses. TAC emissions from these sources are anticipated to be minimal and all restaurant emissions would be regulated under SCAQMD Rule 1138. In addition, Alternative 3 would provide stationary emergency generators in the residential buildings. The emergency generators would result in emissions during maintenance and testing operations. Emergency generators are permitted by the SCAQMD and regulated under SCAQMD Rule 1470. Maintenance and testing would occur periodically, up to 50 hours per year per Rule 1470. As with the Project, Alternative 3's land uses would not include installation of industrial-sized paint booths or require extensive use of commercial or household cleaning products. Alternative 3 would generate only minor amounts of diesel emissions from mobile sources (non-on-site construction vehicles), such as delivery trucks that would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. Furthermore, trucks would be required to comply with the applicable provisions of the CARB 13 CCR, Section 2025 (Truck and Bus regulation) to minimize and reduce PM and NO_X emissions from existing diesel trucks. As a result, toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the uses expected on the Project Site, as with the

Project, potential long-term operational impacts associated with the release of TACs under Alternative 3 would be minimal, regulated, and controlled, and would not be expected to exceed the applicable SCAQMD numerical significance thresholds. Operation of Alternative 3, as with the Project, would not expose sensitive receptors to substantial TAC concentrations, and operational impacts would be less than significant. However, because of Alternative 3's reduced overall scale of development and reduction in use of consumer products and other sources, such as architectural coatings, impacts under Alternative 3 would be less than the Project.

(d) Other Emissions Affecting a Substantial Number of People

Activities under Alternative 3 would potentially generate other emissions, such as those leading to odors. These may include the use of architectural coatings and solvents, as well as the combustion of diesel fuel in on-and off-road equipment. SCAQMD Rule 1113 would limit the amount of VOCs in architectural coatings and solvents. In addition, Alternative 3 would comply with the applicable provisions of the CARB Air Toxics Control Measure regarding idling limitations for diesel trucks. Through mandatory compliance with SCAQMD rules, construction activities and materials are not expected to result in emissions that would create objectionable odors affecting a substantial number of people. Operation of Alternative 3 would not involve land uses typically associated with odor complaints, such as agricultural uses or food processing plants, or any uses identified by the SCAQMD as being associated with substantial odors. As with the Project, Alternative 3 is not expected to discharge contaminants into the air in quantities that would cause a nuisance, injury, or annoyance to the public or property pursuant to SCAQMD Rule 402. Therefore, as with the Project, odor and other emissions impacts under Alternative 3 would be less than significant. Accordingly, impacts with respect to other emissions under Alternative 3 would be similar to the Project.

(c) Cultural Resources

As cultural resources impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 3 apply to both the Project and the Project with the East Site Hotel Option.

(i) Historical Resources

As with the Project, Alternative 3 would not demolish or cause an adverse material change in the eligibility of any historical resources within the Project Site due to direct impacts. Building heights under Alternative 3 (23 stories on the East Site and 22 stories on the West Site) would be lower than the Project and, thus, more consistent with Hollywood's existing built environment than the Project, which would result in 46- and 35-story buildings on the East Site and West Site, respectively. Compared to the Project, Alternative 3 would have less effect related

to contrasting building heights, although potential indirect impacts associated with this contrast under the Project would be less than significant. Therefore, as with the Project, indirect impacts associated with contrasting building heights would be less than significant under Alternative 3, however, impacts would be incrementally less under Alternative 3 than the Project because of the reduction in building heights.

As with the Project, Alternative 3 would also result in temporary alterations to the Hollywood Walk of Fame and potentially significant and unavoidable impacts due to structural vibration at nearby historical resources during construction. As with the Project, impacts associated with Alternative 3 could be reduced to less-than-significant with implementation of Mitigation Measures CUL-MM-1, CUL-MM-2, and NOI-MM-4. As with the Project, the mitigation available for Alternative 3 would avoid significant impacts on the Capitol Records Building and Gogerty Building and would provide similar protections to the other proximate historical buildings subject to potential structural damage from vibration, as follows: the Pantages Theatre, Avalon Hollywood, and the building located at 6316-24 Yucca Street/Art Deco Storefront. However, because Mitigation Measure CUL-MM-2 and Mitigation Measure NOI-MM-4 require the consent of other property owners, who may not agree to participate in their implementation, it is conservatively concluded that structural vibration and settlement impacts on proximate historical resources would remain significant and unavoidable after implementation of mitigation measures. Nonetheless, because Alternative 3 would reduce the extent and duration of the Project's building construction, vibration impacts under Alternative 3 would be less than the Project, and, thus, impacts to historical resources under Alternative 3 would be less than the Project.

(ii) Archaeological Resources

As with the Project, excavation associated with Alternative 3 would reach depths of approximately 64 feet on the East and West Sites. Similar to the Project, these excavations would cut into the historic fill layer, as well as previously undisturbed native soils. Such depths have the potential to encounter prehistoric and/or historic archaeological resources. Alternative 3, as with the Project, would implement Mitigation Measures CUL-MM-3 through CUL-MM-5. With the implementation of these measures, Alternative 3, as with the Project, would provide for appropriate treatment and/or preservation of resources if encountered. Under Alternative 3, as with the Project, potentially significant impacts to archaeological resources would be mitigated to a less-than-significant level. Thus, impacts related to archaeological resources under Alternative 3 would be similar to the Project.

(iii) Human Remains

As with the Project, excavation associated with Alternative 3 would reach depths of approximately 64 feet on the East Site and West Site. Pursuant to California Health and Safety Code Section 7050.5, Public Resources Code 5097.98, and

California Code of Regulations Section 15604.5(e), any discovery of unrecorded human remains would require the immediate halting of construction or ground-disturbing activities and notification of the County Coroner. If the remains are determined to be Native American in origin, a "Most Likely Descendent" would be contacted to assist in determining appropriate treatment for the remains. In the event of the discovery of unrecorded human remains during construction, compliance with applicable regulatory requirements would ensure potential impacts are less than significant. Thus, Alternative 3, as with the Project, would have a less-than-significant impact with respect to human remains. Therefore, impacts with respect to human remains under Alternative 3 would be similar to the Project.

(d) Geology and Soils

As geology and soils impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 3 apply to both the Project and the Project with the East Site Hotel Option.

(i) Seismic Hazards

The Project Site is located within the designated Alquist-Priolo Earthquake Fault Zone for the Hollywood Fault; however, underlying soil horizons indicate the Project Site has not experienced fault movement for at least 120,000 years and active faulting does not occur beneath the Project Site. Similar to the Project, excavation for Alternative 3's subterranean parking would remove the loose sand deposit and require suitable engineered stabilization in accordance with applicable City and CBC building regulations. The Project Site is not located within a designated landslide area, and the potential for landslide and seismically induced slope instability at the Project Site is considered to be low. As with the Project, Alternative 3's application of appropriate engineering controls and compliance with regulations for planned excavation and construction would minimize any potential site stability geologic hazards at the Project Site. Therefore, development of Alternative 3, as with the Project, would not result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury caused in whole or in part by exacerbation of existing environmental conditions. As with the Project, impacts related to geologic conditions under Alternative 3 would be less than significant through proper engineering methods and compliance with City and CBC building regulations. With implementation of building regulations and recommendations of applicable final geotechnical reports, impacts with respect to seismic hazards under Alternative 3 would be similar to the Project.

(ii) Soil Erosion or Loss of Topsoil

As with the Project, excavation for parking structures associated with Alternative 3, would reach depths of approximately 64 feet on the East and West Sites. Similar to the Project, construction of Alternative 3 would increase soil exposure and risk

of soil erosion. The potential for water erosion under Alternative 3 would be reduced by the implementation of standard erosion control measures during site preparation and grading activities. Construction activities would be carried out in accordance with applicable City standard erosion control practices required pursuant to the CBC and the requirements of the NPDES Construction General Permit issued by the LARWQCB, as applicable. In accordance with these requirements, a SWPPP would be prepared that incorporates BMPs to control water erosion during the construction period. Following construction, the Project Site would be covered completely by paving, structures, and landscaping, which would not leave any exposed areas of bare soil susceptible to erosion. Thus, similar to the Project, impacts due to erosion of topsoil would be less than significant under Alternative 3. Alternative 3, like the Project, would comply with CBC building regulations and implement a SWPPP and BMPs and, as with the Project, would result in less than significant soil erosion impacts. Based on the above, impacts under Alternative 3 would be similar to the Project.

(iii) Unstable Geologic Units

Alternative 3, as with the Project, would include sloped excavations properly shored in accordance with the applicable provisions of the CBC to minimize the potential for site stability hazards during temporary excavation activities. As with the Project, Alternative 3 would not be located on an unstable geologic unit. In addition, Alternative 3 would comply with CBC requirements and, prior to issuance of a grading permit, a qualified geotechnical engineer must prepare and submit to the LADBS a Final Geotechnical Report that includes site-specific design recommendations for seismic safety and design requirements for foundations, retaining walls/shoring and excavation to meet applicable State and City code and regulations. As with the Project, through adherence to the CBC and the recommendations of the Final Geotechnical Report, impacts with respect to geologic units under Alternative 3 would be less than significant and similar to the Project.

(iv) Expansive Soils

Similar to the Project, Alternative 3 would encounter and remove near surface soils that have a low to medium potential for expansion during excavation activities. In addition, expansive soil hazards would be further evaluated for the Project Site as part of the LADBS approved Final Geotechnical Report that would include site-specific design recommendations for addressing expansive soils, as needed. Further, as with the Project, compliance with standard construction and engineering practices, and proper engineering erosion control and drainage design would ensure that hazards associated with potential expansive soils or corrosive soils are properly addressed. As such, as with the Project, impacts related to expansive soils or corrosive soils under Alternative 3 would be less than significant and similar to the Project.

(v) Paleontological Resources

As with the Project, Alternative 3 would require excavations extending to 64 feet for subterranean parking. Thus, Alternative 3, as with the Project, could access high sensitivity alluvial sediments. This classification indicates a high potential for fossils to be present in the subsurface. Similar to the Project, implementation of Mitigation Measures GEO-MM-1 through GEO-MM-3 under Alternative 3, would provide for appropriate treatment and/or preservation of resources and would mitigate impacts to paleontological resources to less-than-significant. Thus, impacts to paleontological resources under Alternative 3 would be similar to the Project.

(e) Greenhouse Gas Emissions

Despite the Project and the Project with the East Site Hotel Option having slightly different overall GHG emissions, because impact conclusions and significance levels related to GHG emissions would be the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 3 apply to both the Project and the Project with the East Site Hotel Option.

The construction and occupancy of the Project Site under Alternative 3, as with the Project, would increase GHG emissions. As with the Project, Alternative 3 would incorporate GHG reduction characteristics, features, and measures. Although the State and City have not established quantitative values for GHG emissions, in order to comply with policies and regulations adopted for the purpose of reducing or mitigating GHG emissions, Alternative 3, as with the Project, would incorporate AQ-PDF-1, AQ-PDF-2 and GHG-PDF-1. The smaller scale and lower mobile emissions associated with Alternative 3 would generate lower GHG emissions than the Project's maximum GHG operational emissions. With incorporation of applicable Project Design Features, GHG emission impacts under Alternative 3, as with the Project, would be less than significant. Due to its lower GHG emissions, impacts under Alternative 3 with respect to GHG emissions on the environment would be less than the Project.

Alternative 3, as with the Project, with incorporation of AQ-PDF-1, AQ-PDF-2 and GHG-PDF-1, would be consistent with applicable strategies outlined in CARB's Climate Change Scoping Plan, SCAG's 2016-2040 RTP/SCS, Sustainable City pLAn, and the City's Green Building Code. As such, similar to the Project, impacts related to conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs would be less than significant under Alternative 3. As discussed under the Transportation subsection, below, Alternative 3, as with the Project, would result in a household per capita VMT of 4.8 and is exempt from a retail VMT per capita finding. The Project with the East Site Hotel Option would result in a 4.7 household per capita VMT and 4.8 work VMT per employee. As such, because Alternative 2 would result in a similar

household VMT rate to the Project and would not conflict with applicable GHG plans, similar to the Project, impacts under Alternative 3 with respect to conflicts with GHG plans adopted for the purpose of reducing the emissions of GHGs would be less than significant and similar to the Project.

(f) Hazards and Hazardous Materials

As impacts related to hazards and hazardous materials would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 3 apply to both the Project and the Project with the East Site Hotel Option.

(i) Hazards to the Public or Environment through the Routine Transport, Use, or Disposal of Hazardous Materials

Construction of Alternative 3, as with the Project, would include demolition of existing parking surfaces and structures other than the Capitol Records Complex. Construction equipment and materials, such as fuels, oils and lubricants, solvents and cleaners, adhesives, paints and thinners, degreasers, cement and concrete, and asphalt mixtures, which are all commonly used in construction, would be used, stored, and disposed of in consumer quantities and in accordance with applicable laws and regulations and manufacturers' instructions. As with the Project, operation of Alternative 3 would involve the limited use of potentially hazardous materials typical of those used in residences, offices, hotels and restaurants, including cleaning agents, paints, pesticides, and other materials used for landscaping. In addition, hazardous materials on the Project Site would continue to be acquired, handled, used, stored, and disposed of in accordance with all manufacturers' specifications and all applicable federal, State, and local requirements. Compliance with all applicable regulations concerning the transport, use, and disposal of hazardous waste under Alternative 3, as with the Project, would reduce hazardous materials impacts to a less-than-significant level. While Alternative 3 and the Project would similarly comply with the same regulations, because Alternative 3 would reduce the scale of the Project's construction and operation activity (e.g., use less volume of the hazardous chemicals needed for construction and household maintenance), impacts would be less under Alternative 3 than the Project.

(ii) Hazard to the Public or Environment Involving the Accidental Release of Hazardous Materials into the Environment

As with the Project, Alternative 3 would require excavation of soil for up to five levels of subterranean parking. Such excavation could expose the public or the environment to contaminated soils and soil vapors, and could reveal remnant steel structures and/or possibly USTs associated with historic automobile gas and

service stations. As with the Project, under Alternative 3, Mitigation Measure HAZ-MM-1 (Soil Management Plan), would be implemented and would establish policy and requirements for the disposal of contaminated soils and management of soil vapors or other gases during excavation activities. Therefore, impacts under Alternative 3 related to the accidental release of hazardous materials during construction would be less than significant after mitigation and similar to the Project.

(iii) Hazard Resulting from Hazardous or Acutely Hazardous Materials, Substances, or Waste within One-Quarter Mile of a School

Alternative 3, as with the Project, is not located within one-quarter mile of a school. Similar to the Project, Alternative 3 would implement Mitigation Measure HAZ-MM-1 (Soil Management Plan), which would establish policy and requirements during construction for the disposal of contaminated soils and management of soil vapors or other gases during excavation activities. Also, similar to the Project, Mitigation Measure AQ-MM-1 would be implemented under Alternative 3 requiring the use of Tier IV construction equipment to minimize TAC emissions. In addition, during operation Alternative 3 would not require the handling of acutely hazardous materials or result in the emission of hazardous materials other than, potentially, VOCs. associated with diesel vehicles and consumer products (e.g., architectural coatings, household cleaners, landscaping fertilizers and pesticides, etc.). Alternative 3, as with the Project, during operation would only require the limited use of potentially hazardous materials associated with domestic maintenance and landscaping. In addition, Alternative 3 would comply with applicable local, state, and federal laws and regulations relating to the use of hazardous or acutely hazardous materials and would implement Mitigation Measure HAZ-MM-1 (Soils Management Plan) to ensure that any existing vapors or materials within the existing site would be safely managed. Therefore, as with the Project, impacts related to the use of hazardous or acutely hazardous materials within a quarter mile of a school under Alternative 3 would be less than significant, and similar to the Project.

(iv) Hazardous Materials Sites

Alternative 3, similar to the Project, would not involve construction or alter existing activities on a hazardous materials site compiled pursuant to Government Code Section 65962.5. Accordingly, Alternative 3 and the Project would have no impact with regard to development occurring on a hazardous materials site. Thus, impacts related to development on a hazardous materials site under Alternative 3 would be similar to the Project.

(v) Emergency Response Plan/Emergency Evacuation Plan

Alternative 3, as with the Project, would involve new construction and increased traffic. Alternative 3, as with the Project, would not however, affect the City's Emergency Operations Plan or established disaster evacuation routes, the nearest of which are Santa Monica Boulevard approximately 0.8 miles to the south and Highland Avenue approximately 0.6 miles to the west. As with the Project, Alternative 3 would not require any policy or procedural changes to the City of Los Angeles Emergency Operations Plan or the City's established disaster routes. Also, during an unanticipated disaster event, the LAPD and LAFD would implement operational protocols, as well as plans and programs, on a case-by-case basis, to facilitate emergency evacuations and/or response, which would consider traffic conditions at the time of the emergency. In such instances, traffic would be routed along the City's numerous disaster routes, as determined appropriate by the responding City agencies. Similar to the Project, construction and operation of Alternative 3 would not close any existing streets or otherwise represent a significant impediment to emergency response or evacuation of the local area. Construction of Alternative 3, as with the Project, would occur within the boundaries of the Project Site and within the rights-of-way of adjacent streets, including the median within Vine Street and signal installation along Argyle Avenue. Temporary partial lane closures are not anticipated to significantly affect the circulation of emergency vehicles, which normally have a variety of options for dealing with traffic and congestion, such as sirens, priority use of the roadway, and use of alternate routing. In addition, Alternative 3, as with the Project, would implement Project Design Feature TRAF-PDF-2, which requires preparation of a Construction Traffic Management Plan and includes street closure information, a detour plan, haul routes, and a staging plan. The Construction Traffic Management Plan will be submitted to the City for review and approval. With Project Design Feature TRAF-PDF-2, construction of Alternative 3, like the Project, would not substantially impede public access, create severe consequences for emergency response vehicles, substantially impede travel upon a public right-of-way, or interfere with an adopted emergency response or evacuation plan. During operation, Alternative 3, as with the Project, would be required to establish, implement, and maintain an emergency response plan. The emergency response plan, which would be submitted to the LAFD for inspection and approval prior to implementation, would be inspected annually by the LAFD and include evacuation procedures. In addition, the California Fire Code, Chapter 10, Means of Egress, requires that all habitable structures comply with the California Fire Code, including providing ingress and egress during emergencies. As with the Project, compliance with existing regulations would ensure that an adequate emergency response plan is established for Alternative 3. Overall, as with the Project, impacts under Alternative 3 with respect to conflicts with or interfering with emergency response or evacuation plans would be less than significant. However, because Alternative 3 would generate fewer daily vehicle trips and result in lower occupancy than the

Project, impacts with regard to emergency response would be less than the Project.

(g) Hydrology and Water Quality

As hydrology and water quality impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 3 apply to both the Project and the Project with the East Site Hotel Option.

(i) Water Quality

(a) Construction

Alternative 3, as with the Project, would include construction activities, including earth moving, maintenance/operation of construction equipment, potential dewatering, and handling/storage/disposal of materials, that could contribute to pollutant loading in stormwater runoff from the construction site. Also, wind could convey exposed and stockpiled soils at the construction site into nearby storm drains during storm events, and on-site water activities for dust suppression purposes could contribute to pollutant loading in runoff from the construction site. Alternative 3 would excavate for subterranean garages to depths of approximately 64 feet, as with the Project, with both reaching deeper levels for foundation features. Groundwater depths range from less than 49.2 bgs to approximately 98.3 feet bgs across the Project Site. Alternative 3, as with the Project, has the potential to encounter groundwater during construction. Dewatering, which is subject to LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, may be required. The potential impact related to pollutant loading or groundwater quality that would cause exceedances of water quality standards would be reduced to less-than-significant levels for Alternative 3, as well as the Project, through compliance with regulatory requirements, BMPs, and Building Code grading procedures. However, because the construction footprint and the depth of excavation under Alternative 3 would be similar to the Project, the potential exposure of excavated soils to the elements and encroachment into the water table would be similar the Project. As such, the potential impact with respect to violations of water quality standards during construction under Alternative 3 would be similar to the Project.

(b) Operation

Alternative 3, as with the Project, would incorporate a drainage collection and conveyance system that would detain and treat/filter runoff in compliance with the City's LID Manual requirements to reduce the quantity of, and improve the quality of, rainfall runoff leaving the Project Site. With the implementation of such system and BMPs, Alternative 3, as with the Project, would result in an improvement in the quality of stormwater runoff from the Project Site compared to existing conditions.

As with the Project, impacts related to water quality standards under Alternative 3 would be less than significant, and would be similar to the Project.

(ii) Decreases in Groundwater Supplies or Recharge

Alternative 3, as with the Project, would not require groundwater withdrawal. However, similar to the Project, excavation for the foundations and the subterranean garages during construction of Alternative 3 would have the potential to intercept the groundwater table and, as such, some groundwater removal may be required during construction. Such dewatering during construction would not result in the substantial removal of groundwater that would reduce the local groundwater table. Further, dewatering would only occur temporarily during construction and would not continue post-construction.

Under Alternative 3, as with the Project, subterranean parking would be below the redeveloped areas of the Project Site, resulting in no material change to the amount of stormwater that would percolate into the groundwater table compared to existing conditions. Therefore, similar to the Project, pre- and post-Project infiltration volumes are considered effectively equivalent under Alternative 3. Accordingly, similar to the Project, there would not be a substantial reduction in groundwater recharge from current conditions and Alternative 3 would not introduce activities that could impede sustainable groundwater management of the basin.

Overall, neither Alternative 3 nor the Project would cause substantial depletion of groundwater supplies or substantially interfere with groundwater recharge. Therefore, the impact regarding groundwater recharge or depletion under Alternative 3 would be less than significant and similar to the Project.

(iii) Alteration of Drainage Pattern

(a) Construction

Alternative 3, as with the Project, would include construction activities that could contribute to erosion or siltation if soils are exposed during development of the Project Site. Alternative 3 would require similar excavation and export of materials compared to the Project. Similar to the Project, Alternative 3 would cause a temporary increase in permeable surfaces during construction that would reduce, rather than increase, off-site runoff from the Project Site during a portion of the construction. As with the Project, construction BMPs to manage runoff flows and avoid on- or off-site flooding, would be implemented under Alternative 3. As with the Project, the BMPs would reduce runoff that would potentially create or contribute runoff water exceeding the capacity of existing or planned stormwater drainage systems under Alternative 3. Although the overall duration of construction activities would be less under Alternative 3 than the Project, the maximum off-site flow of Alternative 3 and impact regarding stormwater drainage system capacity

would be similar to the Project and less than significant. With implementation of BMPs, impacts with respect to surface runoff, siltation, rates of runoff and capacity of drainage systems under Alternative 3, as with the Project, would be less than significant. Overall, impacts would be similar to the Project.

(b) Operation

Alternative 3, as with the Project, would largely maintain existing drainage patterns at the Project Site. As with the Project, Alternative 3 would include a drainage system that meets City stormwater retention, treatment and runoff requirements, including all applicable LID requirements. Additionally, under Alternative 3, as with the Project, a reduced peak flow rate of stormwater runoff from the Project Site would occur due to the retention afforded by the proposed LID system and LID BMPs. Due to similarity in site coverage and in the proposed stormwater retention system, the volume of stormwater runoff from the Project Site requiring conveyance by the existing off-site storm drain system would decrease to the same extent under Alternative 3 as with the Project. Therefore, impacts under Alternative 3 would be less than significant and similar to the Project.

(iv) Pollutant Release in Flood Hazard, Tsunami, or Seiche Zones

The Project Site is not located within a 100-year floodplain and is not in a tsunami zone and would not be subject to such flooding hazards. The Project Site is located approximately one mile from the Hollywood Reservoir. Given the distance to the Hollywood Reservoir, any oscillation and subsequent release of water within the reservoir as part of a seiche would not inundate the Project Site. Thus, there would be no potential for risk of release of pollutants due to inundation by seiche.

The Project Site is located within the Hollywood Reservoir inundation area.[23] In compliance with applicable regulatory requirements, Alternative 3, as with the Project, would implement BMPs to minimize pollutants within the Project Site during construction. Post-construction, the nature of pollutants would be typical of other developed sites within the dam inundation area. Dam safety regulations executed by the California Department of Water Resources and other agencies are the primary means of reducing damage or injury due to inundation occurring from dam failure, and reduce the likelihood of inundation. Regarding pollutant release, because Alternative 3, as with the Project, would actively maintain a stormwater management system and would be entirely developed with enclosed parking, buildings, and established landscaping, the exposure of flood waters to pollutants would be minimized. Thus, in the unlikely event of on-site inundation, Alternative 3, like the Project, would not result in the release of significant types or quantities of pollutants. As with the Project, impacts with respect to a significant

23 California Department of Water Resources, Division of Safety of Dams, Dam Inundation Map for Mulholland Dam, https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2, accessed March 15, 2020.

risk of release of pollutants to inundation by flooding, tsunami, or seiche under Alternative 3 would be less than significant and similar to the Project.

(v) Implementation of Water Quality Control Plans

Alternative 3, as with the Project, would incorporate into its design an on-site drainage system that would be consistent with water quality control plans, the policies of which are expressed in City and State water quality regulations for the protection of water resources. Alternative 3, as with the Project, falls within the jurisdiction of water quality plan regulations that assure that development projects are in compliance with clean water policies. These plans and regulations include the LARWQB (Region 4) Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties; and the NPDES stormwater permitting program. In compliance with the City's LID requirements, Alternative 3, as with the Project, would install a capture and reuse system on each site. The detention would temporarily store the captured stormwater until the stored volume is entirely used through the irrigation system. The on-site drainage system would also provide BMPs in accordance with the City's LID requirements. As with the Project, impacts related to water quality control plans under Alternative 3 would be less than significant and similar to the Project.

(h) Land Use and Planning

As land use impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 3 apply to both the Project and the Project with the East Site Hotel Option.

Alternative 3 proposes up to 1,097,466 square feet of residential and commercial floor area, with an approximate FAR of 6.031:1, and 35,664 square feet of publicly accessible open space. The Project proposes up to 1,287,150 square feet of residential and commercial floor area with an approximate FAR of 6.973:1.[24] As with the Project, to allow for development of Alternative 3, the zoning would be amended to C2-2-SN to eliminate the D Limitation, which limits FAR to 3:1 and 2:1 on certain parcels. As with the Project, Alternative 3 would require a Conditional Use Permit to allow FAR averaging to be calculated as a whole rather than by individual parcel or lot and for a residential density transfer between the West Site and East Site. As with the Project, Alternative 3 would not conflict with applicable 2016-2040 RTP/SCS goals to facilitate land use patterns that link land use and sustainable transportation options or the Framework Element Regional Center designation and policies that support a diversity of land uses, and provide for the spatial distribution of development that promotes a reduction of vehicle trips, VMT, and air pollution. Overall, similar to the Project, the density and location of Alternative 3 would not conflict with policies of local and regional land use plans

24 The Project with the East Site Hotel Option would provide 1,277,741 square feet of total floor area.

adopted to avoid or mitigate environmental effects and, as such, impacts with respect to land use would be less than significant. Impacts with respect to existing plans that avoid or reduce environmental impacts under Alternative 3 would be similar to the Project.

(i) Noise

Maximum daily construction noise and vibration levels would be similar under the Project and the Project with the East Site Hotel Option. While the Project and the Project with the East Site Hotel Option would have nominally different daily operational mobile source noise levels, the impact conclusions, significance levels, and mitigation measures are the same for the Project and the Project with the East Site Hotel Option. Accordingly, the below comparisons of impacts of Alternative 3 apply to both the Project and the Project with the East Site Hotel Option.

(i) Noise Levels in Excess of Standards

(a) Construction

As with the Project, Alternative 3 would entail construction activities and excavations for subterranean garages up to 64 feet deep on the East and West Sites. These activities would require the use of heavy-duty machinery. Similar to the Project, maximum construction activities under Alternative 3 would increase noise levels at several sensitive receptor locations in the area. As with the Project, because the maximum amount of construction equipment operating simultaneously within the Project Site would be constrained by the size of the property, the maximum construction noise levels under Alternative 3 would be similar to the Project. Based on a conservative impact analysis, in which noise levels were calculated with all pieces of construction equipment operating simultaneously and located at the construction area nearest to the affected receptors, construction noise levels would exceed the applicable noise significance thresholds at several nearby noise sensitive receptors. Therefore, as with the Project, Alternative 3 would implement Mitigation Measures NOI-MM-1 to NOI-MM-3 to reduce construction noise impacts at off-site noise sensitive receptors to the extent technically feasible. However, as with the Project, with implementation of technically feasible mitigation, construction noise impacts at noise-sensitive receptors 1, 3, and 5 through 13 (11 sites) would still exceed the significance threshold under Alternative 3. Therefore, as with the Project, construction noise impacts associated with on-site noise sources would remain temporarily significant and unavoidable for Alternative 3. Similar to the Project, maximum construction traffic would not result in significant noise levels (greater than 5 dBA L_{eq}) compared to existing traffic noise levels along any of the studied roadway segments, and impacts would be less than significant. Although construction noise levels associated with on-site noise sources would be significant and unavoidable under Alternative 3, Alternative 3 would have a shorter

overall construction due to its reduced scale of development. As such, impacts related to construction noise under Alternative 3 would be less than the Project.

(b) Operation

Alternative 3, as with the Project, would increase off-site traffic and generate on-site composite noise associated with fixed equipment, vehicle activity, and human outdoor activity. However, Alternative 3 would involve a smaller scale project with fewer overall off-site vehicle trips from a maximum of 4,504 vehicle trips per day (Project with the East Site Hotel Option) to 3,621 trips per day under Alternative 3 (an approximately 20-percent reduction); therefore, operational mobile source noise impacts would be incrementally less under Alternative 3 than the Project with the East Site Hotel Option. It is acknowledged that differences in off-site mobile source noise level increases along the studied roadway segments under the Project and the Project with the East Site Hotel Option would be negligible and less than 0.1 dBA CNEL for all analyzed roadway segments. Assuming a 20-percent reduction in Alternative 3-related daily trips on the analyzed roadway segments, compared to the Project with the East Site Hotel Option, the maximum increase in Alternative 3-related traffic noise levels over Future (2040) traffic noise levels would be approximately 0.5 dBA CNEL (from 63.9 to 64.4 dBA CNEL) along Ivar Avenue between Hollywood Boulevard and Selma Avenue and would not exceed the significance threshold of a 5-dBA CNEL. Comparatively, the Project with the East Site Hotel Option (or the Project) would result in a 0.6-dBA increase along this same roadway segment in 2040. This difference in mobile source noise would not be perceptible, and, as such, traffic noise impacts under Alternative 3 would be less than significant and similar to the Project.

While there would be a decrease in residential units under Alternative 3 compared to the Project and increase in residential units compared to the Project with the East Site Hotel Option, the difference in units is not anticipated to result in a perceptible noise level (greater than 3 dBA) difference at off-site noise sensitive receptors. Alternative 3 would also include a paseo but without a performance stage near the “Hollywood Jazz: 1945-1972” mural, and, as such, performance-related noise from this area of the paseo would not occur. However, similar to the Project, any outdoor performances under Alternative 3 would be subject to the noise restrictions in NOI-PDF-3, which would limit noise levels from adversely affecting nearby noise sensitive receptors. Thus, noise, in general, generated from the paseo under Alternative 2 at off-site noise sensitive locations would be largely similar to the Project with the outdoor performance sound restrictions in place. Overall, composite and mobile operational noise levels would be less than significant and similar to the Project.

(ii) Groundborne Noise and Vibration

(a) Construction

Construction of Alternative 3, as with the Project, would generate groundborne construction vibration during building construction phases when heavy construction equipment is used. As with the Project, the estimated vibration velocity levels from all construction equipment (maximum construction conditions) under Alternative 3 would be below the building damage significance criteria at off-site building structures west and east of the West Site and East Site construction areas. However, as with the Project, the estimated construction vibration levels under Alternative 3 would exceed the significance threshold at the Avalon Hollywood, the Pantages Theatre, the Yucca Street Art Deco Building Storefront, the AMDA Vine building, the Argyle House, the Commercial Building at 1718 Vine Street, the Capitol Records Building, and the Gogerty Building. Therefore, vibration impacts, pursuant to the significance criteria for building damage, would be significant. As with the Project, with implementation of Mitigation Measure NOI-MM-4 and compliance with LAMC Section 91.3307.1, vibration impacts associated with Alternative 3 would be reduced to less-than-significant levels for the Capitol Records and Gogerty Buildings. However, similar to the Project, because consent of off-site property owners, who may not agree, would be required to implement the vibration mitigation for potential structural damage to their off-site structures, it is conservatively concluded that structural vibration impacts on the AMDA Vine Building, the Argyle House, the Commercial Building at 1718 Vine Street, the Pantages Theatre, Avalon Hollywood, and Art Deco Building Storefront would remain significant and unavoidable because it cannot be assured that all components of NOI-MM-4 can be implemented.

Regarding human annoyance, as with the Project, the estimated vibration levels due to maximum construction activity at the West Site under Alternative 3, would exceed the significance threshold for human annoyance at vibration sensitive receptors near the Project Site. Implementation of Mitigation Measure NOI-MM-4, under Alternative 3, as with the Project, may lessen but would not reduce all human annoyance impacts to a less-than-significant level. Therefore, as with the Project, no feasible mitigation measures under Alternative 3 would reduce the temporary vibration impacts from on-site construction associated with human annoyance at the vibration-sensitive receptors 3, 5, 6, and 8 through 13. As with the Project, construction vibration levels would be significant and unavoidable under Alternative 3. However, because the overall scale of development would be reduced by approximately 14.7 percent under Alternative 3, the duration of construction and overall construction activity causing vibration would be less, and impacts under Alternative 3 would be less than the Project.

(b) Operation

Day-to-day operations under Alternative 3, as with the Project, would include typical commercial-grade stationary mechanical and electrical equipment, which would produce vibration at low levels that would not cause damage or annoyance impacts to on-site or off-site environment. Primary sources of transient vibration would include vehicle circulation within the proposed parking areas, which would be confined to the immediate area and would not be expected to be perceptible off the Project Site. It is anticipated that mechanical equipment, including air handling units, condenser units, and exhaust fans, under Alternative 3, as with the Project, would be located on building rooftops. Therefore, as with the Project, groundborne vibration from the operation of such mechanical equipment under Alternative 3 would not impact any of the off-site sensitive receptors. Thus, similar to the Project, operational vibration impacts under Alternative 3 would be less than significant. As Alternative 3 would reduce the overall occupancy of the Project Site, off-site groundborne operation vibration is not anticipated to be perceptible under Alternative 3, and, such, impacts under Alternative 3 would be similar to the Project.

(j) Population and Housing

During operation, the Project and the Project with the East Site Hotel Option would have different population, housing, and employment generation statistics. However, both development scenarios would result in the same impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of Alternative 3 apply to both the Project and the Project with the East Site Hotel Option.

Alternative 3, as with the Project, would increase occupancy and use of the Project Site. Alternative 3 would provide 952 units and a population increase of 2,304 new residents.[25] Retail and restaurant uses under Alternative 3 would generate approximately 206 new employees.[26] By comparison, the Project would provide 1,005 residential units, generating approximately 2,433 new residents, and would include 30,176 square feet of retail/restaurant uses, which would generate approximately 206 employees. The Project with the East Site Hotel Option would provide 884 residential units and generate approximately 2,140 new residents. The Project with the East Site Hotel Option, based on 130,278 square feet of hotel floor area would also generate approximately 239 employees[27] and its retail/restaurant

25 Based on 2017 Census American Community Survey 5-Year Estimate data (2013–2017), www.census.gov/programs-surveys/acs/technical-documentation/table-and-geography-changes/2015/5-year.html, per correspondence with Jack Tsao, Housing Planner, Los Angeles Department of City Planning, July 31, 2019.

26 Based on HR&A Economic and Fiscal Impact Report evaluation in which the factor for the Project's retail/restaurant uses would be one employee per 146.5 square feet of floor area.

27 Based on HR&A Economic and Fiscal Impact Report evaluation in which the factor for the Project's retail/restaurant uses would be one employee per 545 square feet of hotel floor area.

uses would generate approximately 206 new employees, for a total of approximately 445 employees. As with the Project, additional employees may be associated with on-site security and maintenance under Alternative 3.

Alternative 3 would generate a population increase of 2,304 persons, which would represent approximately 0.95 percent of SCAG's 2018-2027 population growth projection of 241,442 and approximately 0.36 percent of SCAG's 2018-2040 population growth projection of 635,275. Alternative 3's 206 new employees would represent approximately 0.14 percent of SCAG's 2018-2027 employment growth projection of 146,255 and approximately 0.06 percent of SCAG's 2019-2040 employment growth projection of 320,375. Alternative 3, as with the Project, would not exceed SCAG's growth projections, would help the City meet its housing obligation under SCAG's RHNA allocation, and would provide the type of transit-oriented development encouraged in the Los Angeles General Plan and SCAG 2016-2040 RTP/SCS policies. No existing residences would be displaced. As such, Alternative 3, as with the Project, would result in a less than significant population and housing impacts. Impacts with respect to substantial unplanned population growth under Alternative 3 would be less than significant and similar to the Project.

(k) Public Services

During operation, the Project and the Project with the East Site Hotel Option would have different service-related population statistics, such as number of residents or students. However, both development scenarios would result in the same impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of Alternative 3 apply to both the Project and the Project with the East Site Hotel Option, unless stated otherwise.

(i) Fire Protection

Alternative 3, as with the Project, would involve construction activities and intensify the use of the Project Site so that it would increase demand on fire protection and emergency medical services, as well as potentially reduce emergency access. Alternative 3, as with the Project, would incorporate Project Design Feature TRAF-PDF-2 to provide a Construction Traffic Management Plan to improve vehicular access around the construction site. Project Design Feature TRAF-PDF-3 would identify and enforce parking location requirements for construction workers. The implementation of these Project Design Features would facilitate emergency access. As such, similar to the Project, construction under Alternative 3 would result in less-than-significant impacts with respect to emergency response times and emergency access.

During operation, Alternative 3 would result in a population increase of 2,304 persons and 206 employees. By comparison, the Project would result in in a population increase of 2,433 persons and 206 new employees. The Project with

the East Site Hotel Option would result in a population increase of 2,140 persons and 445 employees. Alternative 3, as with the Project, would comply with the applicable OSHA, Building Code, Fire Code, other LAMC, and LAFD requirements and recommendations, which would reduce demand on LAFD facilities and equipment without creating the need for new or expanded fire facilities. In addition, the Project Site is located within a highly urbanized area accessed via an established street system and within the LAFD's maximum prescribed response distances. Due to urban proximity and facilitated travel for high priority emergency calls, impacts on emergency response would not be significant. Alternative 3, as with the Project, would also be consistent with LAMC fire flow requirements. As such, Alternative 3, as with the Project, would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. Impacts under Alternative 3, as with the Project, would be less than significant. However, because Alternative 3 would reduce construction duration and Project Site occupancy (employees and residents) compared to the Project, impacts related to fire protection services under Alternative 3 would be less than the Project.

(ii) Police Protection

Alternative 3, as with the Project, would result in construction and operation activities that could affect emergency access and increase demand for police protection services. As with the Project, Alternative 3's construction phase, although of shorter duration than that of the Project, could increase potential demand for LAPD services related to theft or vandalism and increased worker activity, as well as construction traffic that could affect emergency response times. To reduce LAPD demand during construction, Alternative 3, as with the Project, would implement a number of security measures under Project Design Feature POL-PDF-1 to limit access to construction areas, including private security, construction fencing, and locked entry. Similar to the Project, construction activities under Alternative 3 may involve temporary lane closures or increase travel time due to flagging or stopping traffic to accommodate trucks entering and exiting the Project Site. Under Project Design Feature TRAF-PDF-2, a Construction Traffic Management Plan would ensure that adequate and safe access remains available at the Project Site during construction activities. Project Design Feature TRAF-PDF-3 would implement a Construction Worker Parking Plan to identify and enforce parking location requirements for construction workers. As with the Project, most construction staging for Alternative 3 would occur on the Project Site, and construction workers would generally start and end their work days in advance of peak traffic hours; thus, reducing their potential effect on traffic and emergency response times. Furthermore, construction-related traffic generated by Alternative 3, as with the Project, would not significantly impact LAPD response times within the Project vicinity as LAPD vehicles normally have a variety of options for avoiding

traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic during construction.

According to LAPD service population generation factors,[28] and assuming that 85 percent of Alternative 3's 952 residential units were one- and two-bedroom (809), which would generate an estimated service population gain of 2,427 residents, and 15 percent of Alternative 3's 952 units were three-bedroom or more (143 units), which would generate a gain of 572 residents, Alternative 3 would result in a gain of 2,996 in residential service population. Similar to the Project, Alternative 3's 30,176 square feet of retail/restaurant floor area would generate a total of 91 persons to the service population. In total, Alternative 3 would increase the LAPD service population by 3,087. According to the same crime factors used by the Project of 15 crimes per 1,000 population, the increase in service population generated by Alternative 3 could result in 47 crimes per year.[29] In comparison the Project and the Project with the East Site Hotel Option would result in 49 and 48 crimes per year, respectively.

The LAPD determines the need for new officers based on a variety of non-definitive factors (i.e., shifts in station and/or patrol boundaries, ongoing staff changes, service populations and crime statistics may be considered when new officers are hired). Alternative 3, as with the Project, would incorporate Project Design Feature POL-PDF-2 to provide a 24-hour/seven-day security program to ensure the safety of its residents, employees, and site visitors. These measures would reduce demand on police services during operation. Similar to the Project, with the implementation of these features, Alternative 3 would not increase police services demand to the extent that the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, Alternative 3, as with the Project, would not result in potential physical impacts associated with construction of police facilities and impacts with respect to police protection would be less than significant. However, with the reduction in scale of development and occupancy under Alternative 3, impacts to police protection services under Alternative 3 would be less than the Project.

(iii) Schools

Alternative 3 would result in 53 fewer residential units than the Project and 68 more residential units than the Project with the East Site Hotel Option. Alternative 3 would generate approximately 227 elementary school students, 62 middle school

28 LAPD service population generation factors are: 3 residents per one- and two-bedroom units, 4 residents per three-bedroom unit, and 3 residents per kfs commercial floor area.

29 Crime total rounded up to next whole number.

students, and 130 high school students totaling 419 students.[30,31] In contrast, the Project and the Project with the East Site Hotel Option would generate 441 students and 424 students, respectively. Similar to the Project, the additional students generated by Alternative 3 could potentially exceed the number of seats available at local schools. However, pursuant to Section 65995 of the California Government Code, the Project Applicant would be required to pay fees in accordance with SB 50. Payment of such fees is intended for the general purpose of addressing the construction of new school facilities, whether schools serving the Project are at capacity or not and, pursuant to Section 65995(h), payment of such fees is deemed to be full mitigation of a project's development impacts. As such, impacts to school facilities and services under Alternative 3 would, as with the Project, would be less than significant. However, because Alternative 3 would generate fewer school-age children than the Project, impacts on schools would be less than the Project.

(iv) Parks and Recreation

Alternative 3 would generate approximately 2,304 new residents that would utilize parks and recreation facilities. In contrast, the Project and the Project with the East Site Hotel Option would generate approximately 2,433 new residents and 2,140 residents respectively. Alternative 3, as with the Project, would comply with LAMC Section 21.10.3, which requires a dwelling unit construction tax of $200 for each new residential unit for City acquisition of new park space. Furthermore, Alternative 3, as with the Project, would meet the requirements of LAMC Sections 12.21 and 17.12, and 21.10.3(a)(1) regarding the provision of useable open space. Although Alternative 3, as with the Project, would not meet the parkland provision goals set forth in the PRP, which recommends 2.0 acres each of neighborhood and community recreational sites and facilities per 1,000 residents and 6.0 acres of regional recreational sites and facilities per 1,000 residents, these are Citywide goals and are not intended to be requirements for individual development projects. Thus, similar to the Project, operation of Alternative 3 would not exacerbate the existing shortfalls in parkland relative to City standards to the extent that new or physically altered park or recreational facilities would need to be constructed, the construction of which would cause significant adverse physical environmental impacts. Similar to the Project, impacts with respect to parks and recreation would be less than significant under Alternative 3. However, since Alternative 3 would generate less population and a proportionate decrease in demand for park space than the Project, impacts would be less than the Project. Under the Project with the East Site Hotel Option, there would be fewer residents than under Alternative

30 Student generation rates per household for residential uses are based on Table 3 of the LAUSD 2018 Developer Fee Justification Study: Elementary = 0.2269; Middle School = 0.0611; High School = 0.1296.

31 For the restaurant/retail uses, the student generation rate of 0.610 student per 1,000 square feet is based on the Neighborhood Shopping Centers rate as provided in Table 15 of the LAUSD 2018 Developer Fee Justification Study. The students are distributed as follows: 54 percent elementary school, 15 percent middle school, and 31 percent high school.

3. Thus, impacts to parks and recreation facilities under Alternative 3 would be greater than the Project with the East Site Hotel Option.

(v) Libraries

Alternative 3's residential population, as with the Project, would increase demand for library services. The LAPL has indicated they have no plans for a new branch library in the Project vicinity. As with the Project, there are also three libraries within one-mile of the of the Project Site which could serve Alternative 3. Furthermore, in consideration of the Project's ability to provide internet service, generate revenue to the City's General Fund, and LAPL's ongoing expansion and availability of online resources, similar to the Project, Alternative 3's increase in demand to any one local library would not be expected to result in a substantial increase in demand that would necessitate new or physically altered facilities. Therefore, similar to the Project, Alternative 3 would not create the need for new or physically altered library facilities, the construction of which would result in substantial adverse physical environmental impacts, in order to maintain acceptable service ratios or objectives. Therefore, as with the Project, impacts to libraries under Alternative 3 would be less than significant. However, because Alternative 3 would generate less population, impacts relative to libraries would be less than the Project. Under the Project with the East Site Hotel Option, there would be fewer residents than under Alternative 3. Thus, impacts to library facilities under Alternative 3 would be greater than the Project with the East Site Hotel Option.

(l) Transportation

During operation, the Project and the Project with the East Site Hotel Option would have different overall VMT and VMT per capita statistics. However, both development scenarios would result in the same transportation-related impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of Alternative 3 apply to both the Project and the Project with the East Site Hotel Option.

(i) Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities

Alternative 3, as with the Project, would support multimodal transportation options and a reduction in VMT, as well as promote transportation-related safety in the Project area. Alternative 3, as with the Project, would not conflict with policies of Mobility Plan 2035 and the City of Los Angeles Complete Streets Design Guide, adopted to protect the environment and reduce VMT. Similar to the Project, Alternative 3 would also be consistent with applicable transportation goals of the Hollywood Community Plan and the Hollywood Redevelopment Plan. Project Design Feature TRAF-PDF-1 under Alternative 3, as well as the Project, would implement a TDM Program to address parking, transit, commute trip reductions, shared mobility, bicycle use, and pedestrian access, and TDM management

strategies. TDM measures to promote bicycle use include bicycle parking spaces, bike lockers, and showers for residents, employees, and visitors. Alternative 3, as with the Project, would not conflict with VisionZero to reduce traffic-related deaths; with LAMC Section 12.37 regarding street standards; with LADOT MPP, Section 321, regarding driveway design standards, or with the 1988 Hollywood Community Plan's Objective 6 to coordinate land use densities and to promote the use of transit. Alternative 3, as with the Project, would increase population density in close proximity to the Metro Red Line Hollywood/Vine Station, other regional Metro bus lines, and the LADOT DASH lines. Alternative 3, as with the Project, would also provide for road and pedestrian improvements, including a paseo linking the West Site and East Site and new median improvements along Vine Street, which would enhance pedestrian safety. A signalized mid-block crosswalk is proposed across Argyle Avenue to help facilitate local pedestrian circulation and access by maintaining a path of east-west travel with the existing mid-block crosswalks across Ivar Avenue and Vine Street. Similar to the Project, Alternative 3 would not conflict with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, and, as such, impacts relative to plans and programs would be less than significant and similar to the Project.

(ii) Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)

As required under CEQA Guidelines Section 15064.3(b) and based on proposed land uses, floor areas, and TDM measures incorporated under Project Design Feature TRAF-PDF-1 (Transportation Demand Management Program), VMT standards would be applicable to Alternative 3, as well as the Project. Alternative 3 would have a household VMT of 4.8 per capita.[32] The Project would have a household per capita VMT of 4.8. As with the Project, Alternative 3, with less than 50,000 square feet of retail use, would be exempt from an employee VMT per capita finding. The Project with the East Site Hotel Option would have a household VMT of 4.7 per capita and a work VMT of 4.8. These rates are all below the thresholds of significance proposed for the City's Central APC household per capita of 6.0 and work VMT of 7.6. per employee. As Alternative 3's VMT per capita and worker VMT are below the APC thresholds and since the household VMT per capita is similar, impacts with respect to CEQA Guidelines Section 15064(b) would be less than significant and similar to the Project.

(iii) Design Hazards

Alternative 3, as with the Project, would reduce existing curb cuts and provide new sidewalks around the perimeter of the Project Site. As with the Project, improvements under Alternative 3 would include a signalized mid-block crosswalk provided across Argyle Avenue to help facilitate local pedestrian circulation and access. As with the Project, Alternative 3 would provide a paseo through the

32 Fehr and Peers, Alternatives Transportation Analysis, March 2020, Appendix R of this Draft EIR.

Project Site between Argyle Avenue and Ivar Avenue. Alternative 3, as with the Project, would eliminate driveway crossings on Vine Street. Access to the Capitol Records Complex (including both the Capitol Records Building and the Gogerty Building) would continue to be provided via the existing driveway on Yucca Street. Similar to the Project, total existing curb cuts would be reduced from 12 total to a total of five. The driveways would not require the removal or relocation of existing passenger transit stops, and would be designed and configured to avoid potential conflicts with transit services and pedestrian traffic. Alternative 3, as with the Project, would not substantially increase hazards, vehicle/pedestrian conflict, or preclude City action to fulfill or implement projects associated with these networks. Similar to the Project, Alternative 3 would contribute to overall walkability through enhancements to the Project Site, streetscape, and crossing of Argyle Avenue, and would not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. Impacts under Alternative 3 would be less than significant and similar to the Project.

(iv) Emergency Access

The Project Site is located in an established urban area served by the surrounding roadway network, and multiple routes exist in the area for emergency vehicles and evacuation. Drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Similar to the Project, no policy or procedural changes to an existing risk management plan, emergency response plan, or evacuation plan would be required due to implementation under Alternative 3. All driveways and the internal circulation would be subject to LAFD review to confirm adequate access is provided internally for on-site emergency vehicle access. With review and approval of Project Site access and circulation plans by the LAFD, Alternative 3, as with the Project, would not impair implementation of or physically interfere with adopted emergency response or emergency evacuation plans. Impacts regarding emergency access under Alternative 3 would be less than significant and similar to the Project.

(m) Tribal Cultural Resources

As tribal cultural resources impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparison of impacts of Alternative 3 apply to both the Project and the Project with the East Site Hotel Option.

The City complied with AB 52 in its consultation and records searches conducted through SCCIC and the NAHC for the Archaeological and Paleontological Resources Assessment. The research indicated no known tribal cultural resources within the Project Site or surrounding area. However, as with the Project, excavations associated with Alternative 3 could have a potential, albeit a low potential, to encounter previously unknown and buried tribal cultural resources. However, similar to the Project, in the event that buried tribal cultural resources

are encountered during construction under Alternative 3, the Project Applicant will be required to comply with the City's standard Conditions of Approval for the treatment of inadvertent Tribal cultural resource discoveries. With compliance, Alternative 3, as with the Project, would result in less-than-significant impacts to tribal cultural resources. As excavation depths would be the same, impacts to tribal cultural resources under Alternative 3 would be similar to the Project.

(n) Utilities and Service Systems – Water, Wastewater, and Solid Waste

During operation, the Project and the Project with the East Site Hotel Option would have different utility demand statistics (i.e., water demand, wastewater generation, and solid waste generation). However, both development scenarios would result in the same impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of Alternative 3 apply to both the Project and the Project with the East Site Hotel Option.

(i) Wastewater

Alternative 3 would generate additional wastewater and increase demand on the existing Hyperion Treatment Conveyance System and Hyperion Treatment Plant. **Table V-5**, *Alternative 3 Wastewater Generation During Operation*, summarizes Alternative 3's approximate wastewater generation. Table V-5 assumes that 45 percent of Alternative 3's 952 residential units would be one-bedroom, 40 percent would be two-bedroom units, and 15 percent would be three-bedroom units, and that indoor amenities, spa/health club, retail/restaurant space, and swimming pool areas would be similar to those of the Project.

TABLE V-5
ALTERNATIVE 3 WASTEWATER GENERATION DURING OPERATION

Land Use	Units	Generation Rate (gpd/unit)[a]	Total Wastewater Generation (gpd)
Residential: Apartment – 1 Bedrooms	428 du	110/du	47,080
Residential: Apartment – 2 Bedrooms	381 du	150/du	57,150
Residential: Apartment – 3 Bedrooms	143 du	190/du	27,170
Retail/Restaurant Lobbies	16,882 sf	50/1,000 sf	844
Restaurant: Full Service Indoor Seat[b]	1,232 seats	30/seat	36,960
Indoor Amenities	23,916 sf	50/1,000 sf	1,196
Health Club/Spa	9,337 sf	650/1,000 sf	6,069
Swimming Pools/spa[c]	10,165 cf	7.4805/cf	76,039
Cooling Towers	7,971 sf	170/1,000 sf	1,355
		Total	**253,863 gpd**

Acronyms: du = dwelling units; sf = square feet, gpd = gallons per day, cf = cubic feet

[a] The generation rates are based on the LASAN sewerage generation factors.

[b] To calculate the number of seats, 1 seat per 15 sf of dining area was assumed. To be conservative, the calculation assumes the Alternative's entire retail/restaurant floor area of 30,176 sf would be restaurant uses.

[c] Includes two moderate sized swimming pools.

SOURCE: ESA, 2020.

As shown in Table V-5, Alternative 3 is estimated to generate approximately 253,863 gpd, or 0.253 mgd.[33] In comparison, the Project is estimated to increase on-site wastewater generation by 311,680 gpd, or approximately 0.312 million mgd and the Project with the East Site Hotel Option is anticipated to generate 322,067 gpd, or approximately 0.322 mgd. These estimates do not account for reductions in wastewater generation that would occur with implementation of conservation measures. Similar to the Project, the increase in wastewater generation by Alternative 3 would be within the capacity limits of the conveyance and treatment facilities serving the Project Site. Similar to the Project, impacts on wastewater conveyance and treatment systems under Alternative 3 would be less than significant. However, because Alternative 3 would generate a lower volume of wastewater, impacts under Alternative 3 would be less than the Project.

(ii) Water Supply

Alternative 3 would increase demand on water supplies and infrastructure. Based on wastewater generation factors shown in Table V-5, residential, commercial, and recreational uses provided under Alternative 3 would generate a maximum day water demand of 253,863 gpd, which includes water demand from draining the pools entirely. However, draining the pools would occur very infrequently and on average over the course of a year, pool–related water demand would average less than approximately 500 gallons per day. Thus, the water demand analysis below is based on this average pool daily water demand to provide a reasonable assessment of yearly water demand. Additional water would be required for landscaping and indoor parking structure space. As under the Project, landscaping would require approximately 2,227 gpd and indoor parking space would require approximately 445 gpd of water. Alternative 3's maximum daily water demand is estimated to be 256,535 gpd prior to water conservation measures. Water conservation measures under the City's Ordinance No. 184,248, the 2017 Los Angeles Plumbing Code, and the 2017 Los Angeles Green Building Code, and implementation of the Applicant's water conservation efforts and Project Design Feature WS-PDF-1 would result in a savings of approximately 39 percent (as assumed for the Project as well and excludes swimming pools). Assuming a water demand of 500 gallons per day for the swimming pool, Alternative 3's average daily water demand would be would typically be less than approximately 110,603 gpd (124 afy).[34]

33 As shown in Table V-5, the total amount of wastewater generation for swimming pools is 76,039 gpd. This circumstance would occur only if the swimming pools were all drained on any given day. Daily wastewater generation for the swimming pools would typically be less than approximately 500 gallons per day. As such, this analysis is conservative in presenting the maximum wastewater generation scenario for swimming pools.

34 Alternative 3 Land Uses from Table V-5 excluding pools (177,824 gpd) + Landscaping (2,227 gpd) + Indoor Parking (445 gpd) = 180,496 gpd. Then, 61% X 180,496 gpd = 110,103 gpd. Then, 110,103 gpd + 500 gpd (pools) = 110,603 gpd.

In comparison, the Water Supply Assessment for the Hollywood Center Project indicated the Project and the Project with the East Site Hotel Option would have a water demand of 163,098 gpd (~183 afy) and 182,896 gpd (~205 afy), respectively, accounting for water conservations and compliance with applicable regulations.[35] Similar to the Project, Alternative 3's water demand projections would be within LADWP's 2015 UWMP's projected increases in Citywide water demands, while anticipating multi-dry year water conditions through the planning horizon of 2040.

Furthermore, similar to the Project, operation of Alternative 3 would require new connections from existing facilities. With regulatory compliance to the LAMC and coordination with LADWP, operation of Alternative 3, as with the Project, would not result in the relocation or construction of new or expanded water facilities, the construction or relocation of which would cause significant environmental effects. Similar to the Project, operational impacts on water infrastructure under Alternative 3 would be less than significant.

Based on the above, while Alternative 3 and the Project would result in less than significant water supply and infrastructure impacts, because Alternative 3 would result in less average daily water demand compared to the Project, impacts would be less under Alternative 3 than the Project.

(iii) Solid Waste

Alternative 3, as with the Project, would increase solid waste generation at the Project Site that would need to be landfilled. The construction of Alternative 3 would generate less construction waste than the Project due the approximately 14.7-percent reduction in total floor area (1,097,466 square feet under Alternative 3 compared to 1,287,150 square feet under the Project). The maximum construction waste under the Project would represent a small fraction of the available capacity of the County's Azusa Land Reclamation landfill or one of the inert debris engineered fill operations in Los Angeles County. As such, impacts associated with construction under the Project and Alternative 3 would be less than significant. However, because construction materials would be less under Alternative 3, it would have less impact with respect to construction waste than the Project.

During operation, Alternative 3's 952 residential uses would generate approximately 11,738 pounds of solid waste per day (based on 12.33 pounds per day per unit) or approximately 1,831.1 tons per year. The retail/restaurant uses, which are the same as under the Project, would generate approximately 2,159 pounds per day, or 336.8 tons per year. Before diversion, Alternative 3 would generate approximately 13,897 pounds per day or 2,167.9 tons per year. After implementation of the City's 65 percent diversion rate, Alternative 3 would

35 LADWP, WSA for the Hollywood Center Project, December 11, 2018, pp. 11 and 12. Provided in Appendix P-2 of this Draft EIR.

generate approximately 2.08 tpd or 758.77 tons of solid waste per year. The Sunshine Canyon Landfill, the primary recipient of Class III solid waste from the City, has a maximum daily capacity of 12,100 tpd and a disposal rate of 6,765 tpd, indicating a residual daily capacity of 5,335 tpd. Alternative 3's addition of 2.43 tpd[36] landfill disposal rate would represent approximately 0.05 percent of Sunshine Canyon's residual daily capacity, assuming diversion.

By comparison, the Project, which would have a higher disposal rate than the Project with the East Site Hotel Option, would generate approximately 2,639 tons of solid waste requiring landfill disposal per year and approximately 7.23 tons of solid waste per day. After implementation of the City's 65 percent diversion rate, the Project would generate approximately 923.65 tons of solid waste per year or 2.53 tons of solid waste per day, which would be 2.96 tpd landfill disposal rate.

Similar to the Project, Alternative 3's additional solid waste generation would be accommodated by the County's City-certified waste processing facilities. As with the Project, Alternative 3's 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. Similar to the Project, impacts with respect to solid waste under Alternative 3 would be less than significant. However, because Alternative 3 would reduce solid waste compared to the Project, impacts under Alternative 3 would be less than the Project.

(o) Energy Conservation and Infrastructure

During operation, the Project and the Project with the East Site Hotel Option would have different energy consumption statistics. However, both development scenarios would result in the same impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of Alternative 3 apply to both the Project and the Project with the East Site Hotel Option.

(i) Efficient Energy Consumption

Alternative 3, as with the Project would incorporate energy-conservation measures beyond regulatory requirements as specified in Project Design Features GHG-PDF-1 and WS-PDF-1. These require USGBC LEED Gold Certification energy performance optimization features such as reducing building energy cost by a minimum of 11.6 percent for new construction compared to the 2019 Title 24 Building Energy Efficiency Standards and installing energy efficient appliances. As with the Project, Alternative 3 would comply with and exceed existing minimum energy efficiency requirements, such as the Title 24 standards and CALGreenCode, including for building rooftops to be solar-ready so that on-site solar photovoltaic or solar water heating systems could be installed in the future.

36 Alternative 3's daily disposal in tons assumes that landfills operate six days per week; 52 weeks * 6 days = 312 days. Therefore, the daily disposal is calculated by 758.77 tons / 312 days = 2.43 tpd.

Alternative 3, as with the Project, would be designed to exceed ASHRAE 90.1-2010 standards by more than 20 percent through the use of efficient heating, ventilation, and HVAC systems and a high-performance building envelope. Indoor air quality would be enhanced through the selection of low-VOC emitting materials, and exhaust systems would be utilized for optimal ventilation in both kitchens and bathrooms. Alternative 3, as with the Project, would meet the requirements of the Los Angeles Green Building Code and the CALGreen Code regarding on-site renewable energy sources.

Alternative 3, as with the Project, would be consistent with and not conflict with SCAG's land use type for the area and would encourage alternative transportation, and achieve a reduction in VMT resulting in a transportation efficiency level better than the Hollywood neighborhood and City and statewide average. Alternative 3, as with the Project would not cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation and, as such, impacts related to efficient energy consumption would be less than significant. With the reduction in floor area of approximately 14.7 percent compared to the Project, Alternative 3 would generate a lower level of energy demand than would the Project. Thus, impacts related to efficient energy consumption as with the Project would be less than significant and, because the scale of development would be less, impacts with respect to energy consumption would be less than the Project.

(ii) Conflict with Plans for Renewable Energy or Energy Efficiency

As with the Project, Alternative 3 would comply with existing energy standards, would include a project design and building operation that would incorporate energy-conservation measures beyond those otherwise required, and would not conflict with adopted energy conservation plans. Alternative 3, as with the Project, would be designed to meet the USGBC LEED Gold Certification including energy performance optimization features, such as reducing building energy demand by a minimum of 11.6 percent for new construction compared to the 2019 Title 24 Building Energy Efficiency Standards. Among other features it would install energy efficient appliances that meet the USEPA ENERGY STAR rating standards or equivalent; incorporate heat island reduction strategies, such as high-reflectance and vegetated roofs for the Project roof areas; provide water efficient fixtures and landscaping to reduce indoor water usage; and provide an HVAC system that would be sized and designed in compliance with the CALGreen Code to maximize energy efficiency caused by heat loss and heat gain. Alternative 3, as with the Project, would have the same automobile fuel efficiencies associated with access to alternative modes of transportation.

By exceeding the regulatory standards, similar to the Project, Alternative 3 would have a less-than-significant impact regarding the provisions of plans for renewable energy and energy efficiency. As Alternative 3 would be in compliance with plans

for renewable energy and energy efficiency, impacts under Alternative 3 would be similar to the Project.

(iii) Relocation or Expansion of Energy Infrastructure

Alternative 3, as with the Project, would utilize energy infrastructure to accommodate their respective demand for energy resources. Similar to the Project, Alternative 3's electricity and natural gas demands are expected to represent a small fraction of LADWP and SoCalGas energy supplies and the service provider's existing infrastructure. As concluded in Section IV.O, *Energy Conservation and Infrastructure*, of this Draft EIR, planned electricity and natural gas supplies would be sufficient to meet the Project's demand for electricity and natural gas. As with the Project, Alternative 3 would not result in an increase in demand for electricity or natural gas services that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Similar to the Project, impacts with respect to the relocation or expansion of energy infrastructure under Alternative 3 would be less than significant. As off-site energy infrastructure would accommodate energy demand under Alternative 3, impacts would be similar to the Project.

(3) Relationship of the Alternative to Project Objectives

As described above, Alternative 3, the Reduced Maximum Height Alternative, would consist of four residential buildings, two of which would contain retail/restaurant uses. The taller buildings would rise to 23 stories on the East Site and 22 stories on the West Site. Proposed land uses include 827 market rate residential units, 125 senior affordable units, and 30,176 square feet of retail/restaurant uses. Alternative 3 would reduce the Project's total floor area by approximately 14.7 percent. Alternative 3 would include 35,664 square feet of publicly accessible open space and a paseo running between Argyle Avenue and Ivar Avenue.

Alternative 3 would maintain views of the Capitol Records Building through building setbacks from Vine Street and the open paseo, running between Ivar Avenue and Argyle Avenue. However, because of reductions in the setback between the Capitol Records Building and the East Building, it would constrain closer views compared to the Project. It would incorporate senior affordable residential units, and it would also be constructed to meet LEED-Gold equivalent standards. As such, it would be fully consistent with the following Project Objectives:

1. Redevelop the Project Site, with a mixed-use development that protects the architectural and historical heritage of the Capitol Records Complex and activates Hollywood Boulevard, Vine Street, and surrounding streets through connected, publicly available landscaped open space, including a paseo with

shopping, seating, open air dining, and art installations, and plazas accommodating performances and community focused events.

2. Create a hub of activity surrounding the Capitol Records Complex and the intersection of Hollywood Boulevard and Vine Street, by activating the eastern end of Hollywood Boulevard and the terminus of the Hollywood Walk of Fame, to increase engagement with the Capitol Records Complex.

5. Promote local, regional, and State land use and mobility objectives and reduce vehicle miles traveled (VMT) by maximizing infill development within an existing Regional Center near jobs, retail, and entertainment in proximity to transit and transportation infrastructure that encourages pedestrian activity.

6. Provide affordable senior housing with outdoor spaces in proximity to public transportation, allowing an age-specific demographic to continue to live in their residence of preference while maintaining access to services and goods.

7. Cluster jobs and housing near transit by locating a high-density, mixed-use development within a Transit Priority Area.

8. Support the growth of the City's economic base through the introduction of an economically viable project which creates a significant number of construction and permanent jobs.

9. Activate the Hollywood area with commercial opportunities that could serve local employees, generate local tax revenues, and provide new permanent jobs and housing for residents in support of local business.

10. Incorporate sustainable and green building design and construction to promote resource conservation, including waste reduction, efficient water management techniques, and conservation of energy to achieve a LEED-Gold equivalent building.

Although Alternative 3 would provide for mixed use development and achieve Project Objectives, because of reduced setbacks between the Capitol Records Building and the East Building, and its rectangular buildings, it would not meet the following objectives to the same extent as under the Project and is, thus, considered to be only partially consistent with the following objectives:

3. Develop architectural buildings that are compatible with the Capitol Records Complex through a design that responds to the Capitol Records Building's modernist architectural character, and preserve views of the Capitol Records Building.

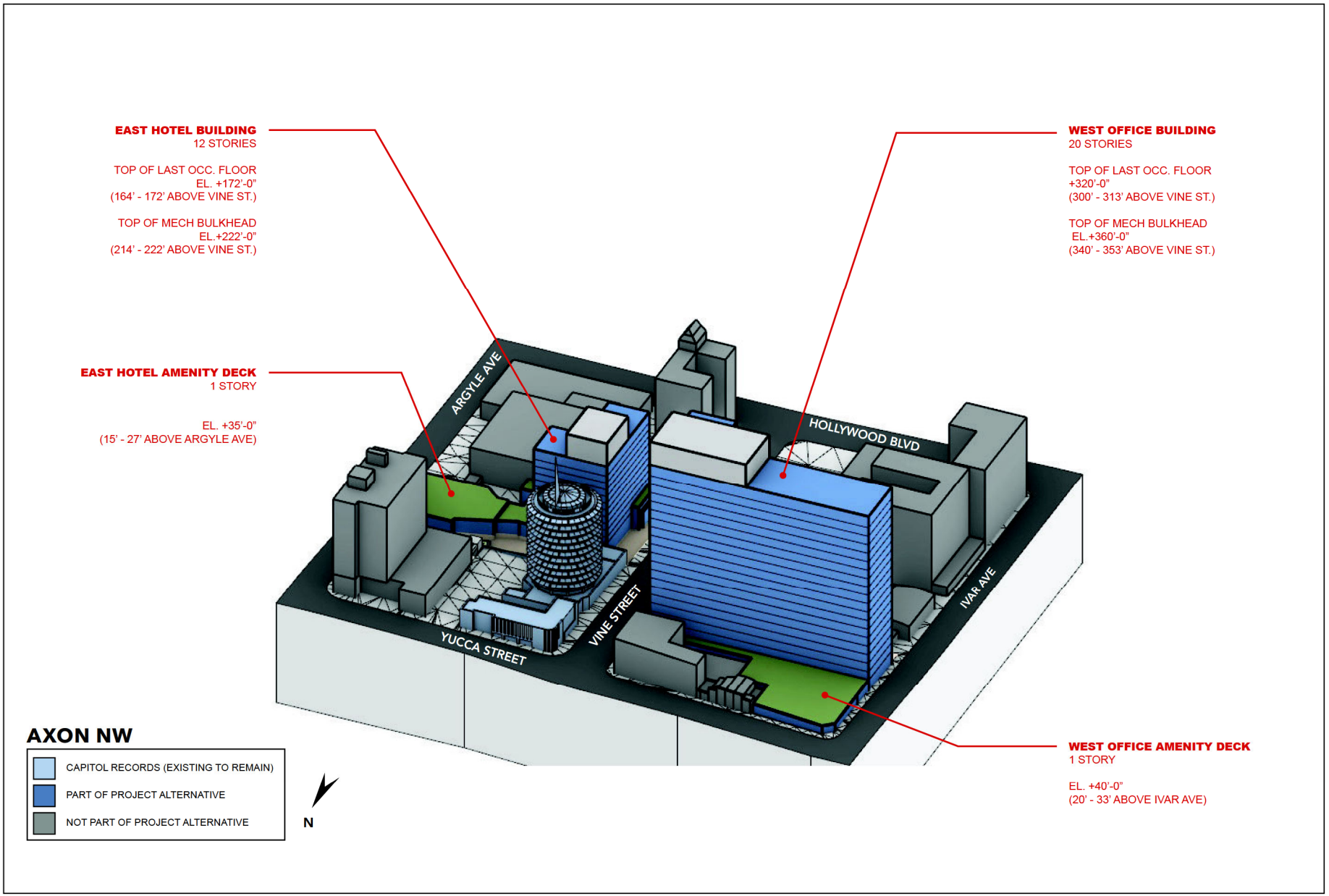
4. Maintain prominent views of the Capitol Records Building by providing building setbacks, visual buffers, open space between the Project's new buildings and the Capitol Records Complex, and safe public viewing areas from the proposed

paseo and plazas, to maximize view corridors and continue showcasing its distinctive architectural design.

d) Alternative 4: Office, Hotel and Commercial Alternative

(1) Description of the Alternative

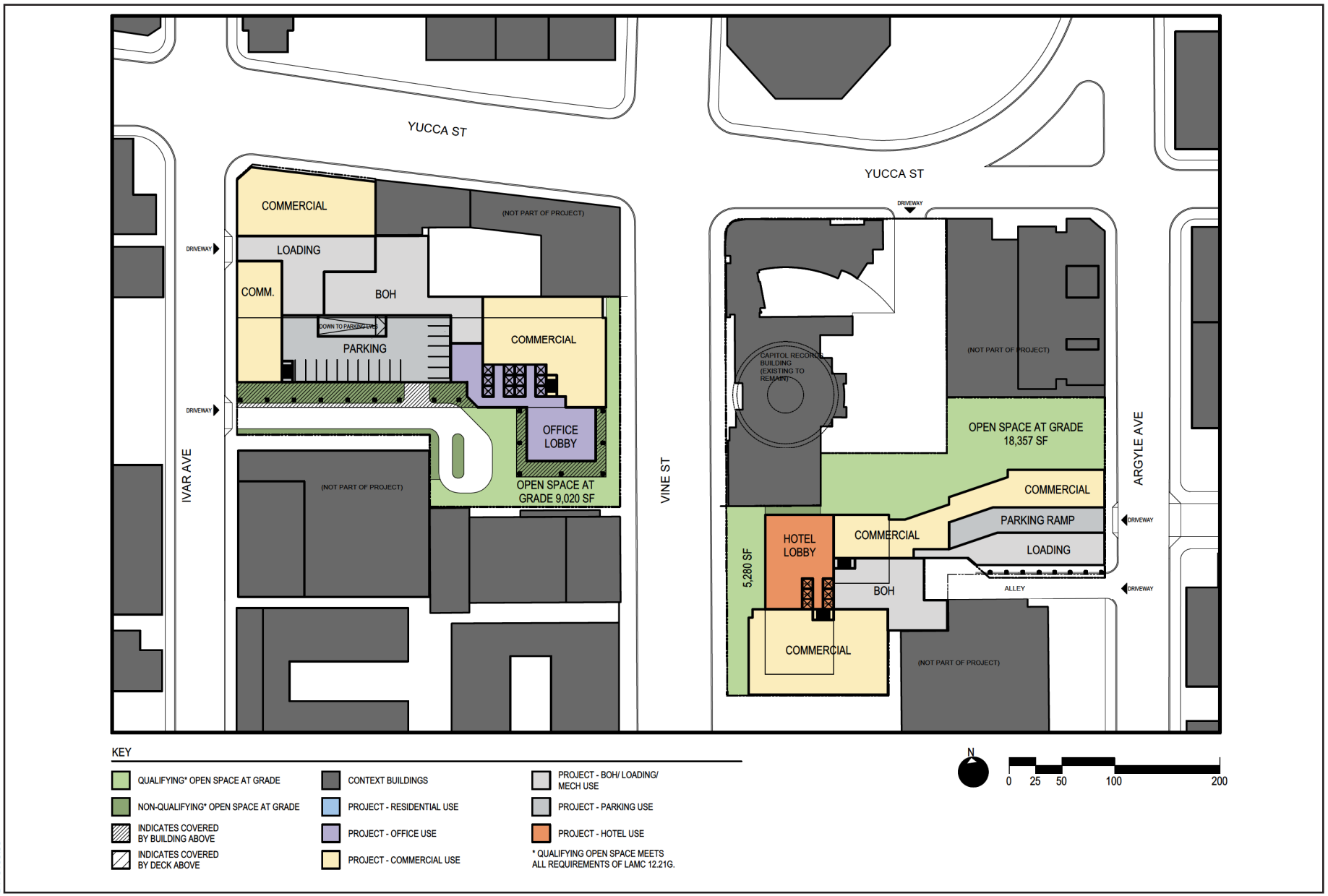
The Office, Hotel and Commercial Alternative (Alternative 4) would incorporate retail and restaurant floor area, as under the Project. Approximately 17,485 square feet of retail and restaurant uses would be provided on the East Site, and approximately 12,692 square feet of retail and restaurant uses would be provided on the West Site, for a total of 30,176 square feet of retail and restaurant uses. Alternative 4 would also include the development of a 324-room hotel on the East Site and a 603,060-square-foot office building on the West Site. Unlike the Project, Alternative 4 would not provide any residential uses. As shown in **Figure V-7**, *Building Massing for Alternative 4*, the hotel and office components under Alternative 4 would be provided within two high-rise buildings, one each on the East Site and West Site, respectively. The hotel building on the East Site would be 12 stories and reach a height of 172 feet at the top of the 12th story and 222 feet at the top of the bulkhead. The office building on the West Site would be 20 stories and reach a height of 320 feet at the top of the 20th story and 360 feet at the top of the bulkhead. Alternative 4 would be developed with a total of 32,657 square feet of publicly accessible open space at the ground level, which would form a paseo through the East Site and a plaza accessible from Vine Street on the West Site. No performance stage would be located within the paseo off of Vine Street on the East Site. The total new floor area for Alternative 4 would be approximately 789,967 square feet, which would result in an FAR of 4.501:1 and represent an approximate 38.6-percent reduction in the Project's floor area. A five-level subterranean parking structure containing 624 spaces would be provided on the East Site, and a five-level subterranean parking structure containing 837 parking spaces would be provided on the West Site, for a total of 1,461 parking spaces. Vehicle and bicycle parking would be provided in accordance with LAMC requirements. **Figure V-8**, *Alternative 4 Ground Floor Plan*, illustrates the uses and open space at the ground level, and **Figure V-9**, *Alternative 4 Building Footprints*, illustrates the location of proposed buildings relative to the proposed ground level uses. The components of Alternative 4 are compared to those of the Project in **Table V-6**, *Comparison of Alternative 4 to the Project*, below.



SOURCE: Handel Architects, 2019

Hollywood Center Project

Figure V-7
Building Massing for Alternative 4

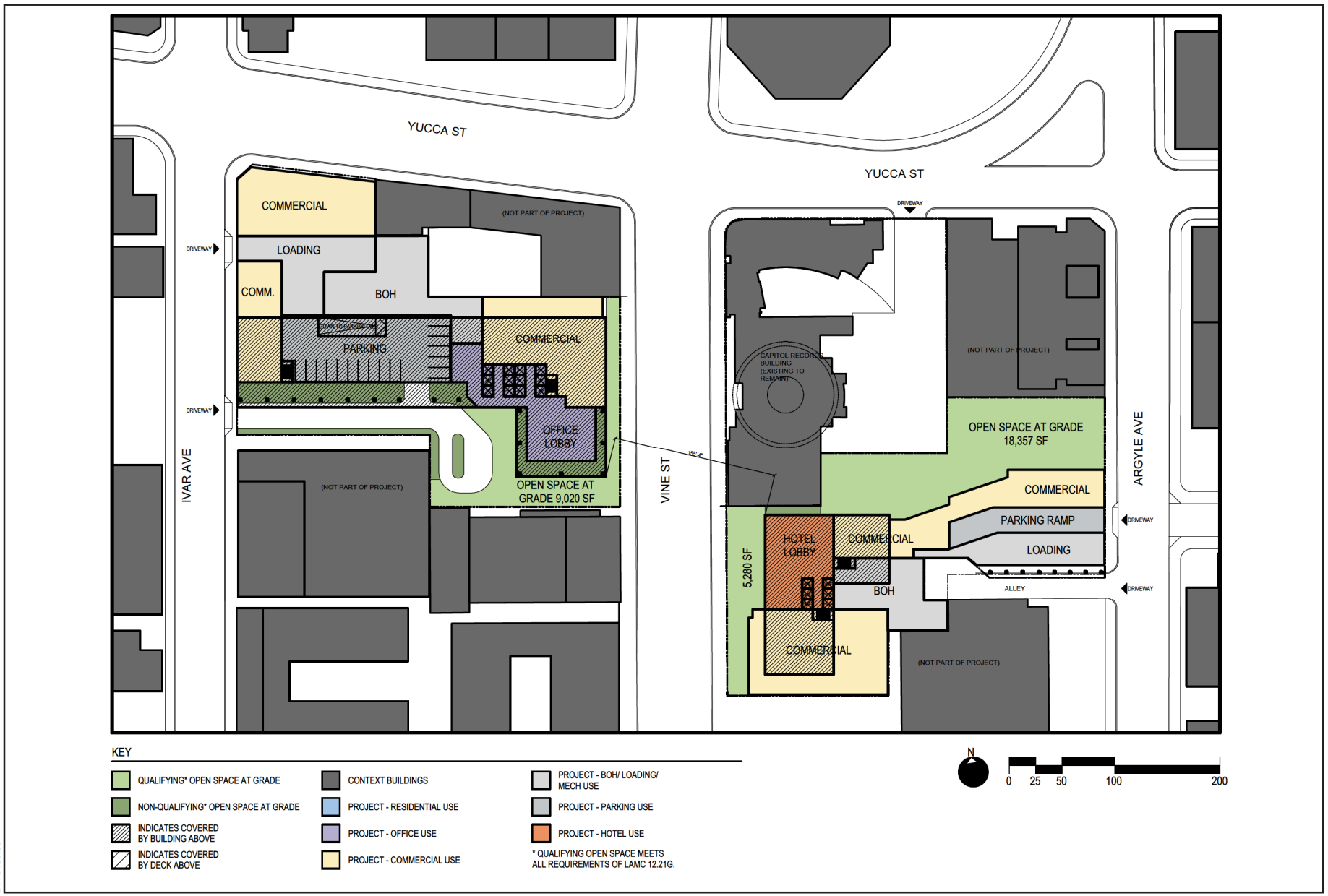


D170105.00

SOURCE: Handel Architects, 2020

Hollywood Center Project

Figure V-8
Alternative 4 Ground Floor Plan



D170105.00

SOURCE: Handel Architects, 2020

Hollywood Center Project

Figure V-9
Alternative 4 Building Footprints

TABLE V-6
COMPARISON OF ALTERNATIVE 4 TO THE PROJECT

Component	Project	Project With the East Site Hotel Option	Alternative 4
Publicly Accessible Open Space	33,922 sf	33,922 sf	32,657 sf
East Site	24,990 sf	24,990 sf	23,637 sf
West Site	8,932 sf	8,932 sf	9,020 sf
Maximum Building Height			
East Site	46 stories, 595 feet	46 stories, 595 feet	12 stories, 222 feet
West Site	35 stories, 469 feet	35 stories, 469 feet	20 stories, 360 feet
Market-Rate Units Total	872 du	768 du	0
East Site	423 du	319 du	0
West Site	449 du	449 du	0
Senior Affordable Units Total	133 du	116 du	0
East Site	65 du	48 du	0
West Site	68 du	68 du	0
Maximum Building Height Senior Buildings			
East Site	11 stories, 149 feet	9 stories, 131 feet	N/A
West Site	11 stories, 155 feet	11 stories, 155 feet	N/A
Retail and Restaurant Floor Area Total	30,176 sf	30,176 sf	30,176 sf
East Site	17,485 sf	17,485 sf	17,485 sf
West Site	12,691 sf	12,691 sf	12,691 sf
Hotel (East Site)	N/A	220 rooms, 130,279 sf	324 rooms, 146,698 sf
New Office Floor Area (West Site)	N/A	N/A	603,060 sf
Total New Floor Area	1,287,150 sf	1,277,741 sf	789,967 sf
Vehicle Parking	1,521 spaces	1,521 spaces	1,461 spaces
East Site	684	684 spaces	624 spaces
West Site	837	837 spaces	837 spaces
FAR[a]	6.973:1	6.901:1	4.501:1

[a] The calculated FAR includes new floor area in addition to the floor area of the Capitol Records and Gogerty Buildings (114,303 sf).

SOURCE: ESA, 2020

(2) Environmental Impacts

(a) Aesthetics

SB 743 (codified in PRC Section 21099(d)(1)) and ZI File No. 2452 provide that a mixed-use or employment center project in a designated TPA site and infill area is not required to evaluate physical aesthetic impacts pertaining to scenic vistas, scenic resources, and light and glare in an EIR. Although the Project and this Alternative meet these criteria, for disclosure purposes only, information based on City thresholds is provided relative to scenic vistas, scenic resources, and light and glare.

As aesthetics impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 4 apply to both the Project and the Project with the East Site Hotel Option.

(i) Scenic Vistas

Alternative 4 would involve the construction of two new buildings, including a 12-story hotel rising 222 feet to the top of the bulkhead on the East Site and 20-story office building rising 360 feet to the top of the bulkhead on the West Site. Construction and operation of Alternative 4 would affect public views across the existing surface parking lots and views of scenic elements within the Project Site. As with the Project, a construction fence will be erected along the periphery of the Project Site, including Vine Street (required under Project Design Feature AES-PDF-1), which would temporarily block views of the "Hollywood Jazz: 1945-1972" mural. Construction activities would also require the temporary removal of a portion of the Hollywood Walk of Fame. However, construction would be temporary and would not have a permanent substantial adverse effect on views of these features. As with the Project, the West Site's high-rise building would block some passing views of the historic Knickerbocker sign from the Hollywood Freeway. However, similar to the Project, because of the continuous movement of traffic and availability of other freeway views to the sign, the effect on this freeway view is not considered a substantial adverse effect of Alternative 4. There are no existing significant panoramic views across the Project Site of the historic Hollywood Sign from adjacent streets or other public areas. Public views of broader scenic resources, such as the mountains and the Hollywood Sign through other street corridors, would continue to be available and would not be affected by construction or operation of Alternative 4. As with the Project, Alternative 4 would block some intermittent views of the historic Capitol Records Building from sections of Ivar Avenue, Hollywood Boulevard, and Argyle Avenue. During construction and operation of Alternative 4, as with the Project, the Capitol Records Building would continue to be visible from more prominent view locations, such as the Hollywood Hills and the intersection of Hollywood Boulevard and Vine Street, or other sections along local streets. Alternative 4, as with the Project, would provide viewing

opportunities of the Capitol Records Building from a new public paseo through the East Site and a plaza accessible from Vine Street on the West Site. As the East Site Senior Building would not be constructed, a broader view of the Capitol Records Building would be available through the paseo from Argyle Avenue than the Project. As with the Project, the East Site high-rise would be set back from Vine Street to allow views of the Capitol Records Building from the intersection of Hollywood Boulevard and Vine Street. As with the Project, Alternative 4 would not result in substantial adverse effects on scenic vistas. Therefore, when compared to the Project, the effects on scenic vistas under Alternative 4 would be similar to the Project.

(ii) Scenic Resources

Impacts to on-site scenic resources, such as the on-site Capitol Records Building, the "Hollywood Jazz: 1945-1972" mural, the adjacent Hollywood Walk of Fame, and existing street trees, under Alternative 4 would be the same as the Project. Similar to the Project, construction vehicles and other construction activity on or adjacent to the Vine Street sidewalk under Alternative 4 would potentially impact the Hollywood Walk of Fame. However, as with the Project, implementation of Mitigation Measure CUL-MM-1 would ensure protection and temporary removal of the bronze and terrazzo Hollywood Walk of Fame stars and reduce impacts to less-than-significant. As with the Project, Alternative 4 would replace removed street trees with similar species and plant additional trees within the Project Site's open space areas, including the paseo, in accordance with the requirements of the LAMC and the City's Urban Forestry Division's requirements (currently requiring street tree replacement on a 2:1 basis). In addition, similar to the Project, Alternative 4 would preserve the "Hollywood Jazz: 1945-1972" mural. Overall, similar to the Project, Alternative 4 would not substantially damage scenic resources. As with the Project, Alternative 4 would implement measures to ensure the Hollywood Walk of Fame is protected and that no physical changes to nearby scenic resources or historic buildings would occur. Therefore, when compared to the Project, the effects on scenic resources under Alternative 4 would be similar to the Project.

(iii) Regulations Governing Scenic Quality

CEQA Appendix G addresses whether a project in an urban area would conflict with regulations that govern scenic quality, such as those applicable to street trees, exterior lighting, signage, and compliance with applicable policies of the General Plan or Community Plan. As with the Project, Alternative 4 would replace street trees and provide exterior lighting in compliance with LAMC regulations and would comply with signage regulations set forth under the HSSUD. In addition, similar to the Project, Alternative 4 would not conflict with Objective 7 of the Hollywood Community Plan, which requires the preservation of open space and promotes the preservation of views, natural character and topography of mountainous parts of the Hollywood community. The Project Site is visible from the Mulholland Scenic

Parkway's Hollywood Bowl Overlook, an area with broad open space views in the Hollywood Hills. As with the Project, Alternative 4 would not adversely affect views from this open space area and, as such, would be consistent with Objective 7 of the Community Plan to preserve views. Therefore, similar to the Project, Alternative 4 would not conflict with the LAMC, HSSUD, or the applicable Community Plan open space policy. As with the Project, impacts under Alternative 4 would be less than significant. As Alternative 4 would also comply with regulations governing scenic quality, impacts under Alternative 4 would be similar to the Project.

(iv) Light and Glare

As with the Project, Alternative 4 would introduce new lighting, including temporary construction lighting, wayfinding lights, security lighting, landscape lighting, street-level commercial signs, paseo lighting, architectural accent lighting, and interior lighting visible through windows, all of which would be installed pursuant to LAMC lighting requirements. Architectural lighting would be provided at the top of the new buildings, as under the Project. In combination with the Capitol Records Building, any architectural lighting and signage would be consistent with HSSUD policy encouraging illuminated signage to reflect a modern, vibrant image of Hollywood. However, as with the Project, no still or moving images would be projected onto the buildings. Project Design Feature AES-PDF-3 would ensure that glass used in building façades will be anti-reflective or treated with an anti-reflective coating in order to minimize glare. Project Design Feature AES-PDF-4 would require that construction and operational lighting be shielded and directed downward (or on the specific on-site feature to be lit) in such a manner so as to avoid undue glare or light trespass onto adjacent uses. Similar to the Project, the incorporation of Project Design Features and LAMC requirements in Alternative 4 would ensure that potential light and glare would not adversely affect day or nighttime views. However, Alternative 4 would result in smaller buildings and reduced scale of lighting compared to the Project and, as such, light and glare effects would be less than the Project.

(b) Air Quality

Daily air quality construction emissions would be similar under the Project and the Project with the East Site Hotel Option. While the Project and the Project with the East Site Hotel Option would have nominally different daily operational emissions, the impact conclusions, significance levels, and mitigation measures are the same for the Project and the Project with the East Site Hotel Option. Accordingly, the below comparisons of impacts of Alternative 4 apply to both the Project and the Project with the East Site Hotel Option.

(i) Conflict with an Air Quality Management Plan

Similar to the Project, Alternative 4 would include new development on the Project Site that would generate new criteria pollutant emissions. Similar to the Project,

Alternative 4 would be consistent with the goals of SCAG's 2016-2040 RTP/SCS and growth projections in the 2016 AQMP, since the growth would occur in a HQTA and a TPA. As with the Project, Alternative 4 would be consistent with the AQMP in its incorporation of appropriate control strategies for emissions reduction during construction and operation. However, Alternative 4 would to a lesser degree than the Project, be consistent with applicable goals, objectives, and policies of the Air Quality Element of the General Plan that support and encourage pedestrian activity in the Hollywood area. However, with no housing, Alternative 4 would not contribute to a land use pattern addressing housing needs while reducing vehicle trips and air pollutant emissions within a TPA. For these reasons, impacts under Alternative 4 with respect to consistency with air quality management plans would be less than significant, but greater than the Project.

(ii) Cumulative Increase in Criteria Pollutants/Violation of Air Quality Standards

(a) Construction

As with the Project, Alternative 4's construction phases have the potential to generate emissions that would exceed SCAQMD air quality standards through the use of heavy-duty construction equipment, construction traffic, fugitive dust emissions, paving operation, and the application of architectural coatings and other building materials. The maximum emissions under Alternative 4 would be similar to the Project because emission levels are based on a single day in which maximum construction activity would occur. Similar to the Project, with incorporation of Mitigation Measure AQ-MM-1 which would require the use of diesel-powered construction equipment that meet USEPA Tier 4 Final off-road emissions standards; use of pole electricity or alternative energy to power electric tools, equipment, and lighting; maintenance and operation of construction equipment to minimize exhaust emissions; and incorporation of Project Design Feature GHG-PDF-1 (Green Building Features), construction emissions under Alternative 4 would not exceed SCAQMD numerical significance thresholds. Similar to the Project, because Alternative 4's construction emission levels would be below the applicable numerical significance thresholds, emissions related to air quality standards would be less than significant. Alternative 4 would reduce the Project's scale of development by 38.6 percent and, thus, would reduce overall construction duration. As Alternative 4 would reduce construction duration, impacts with respect to cumulative increases in criteria pollutants and violations of air quality standards would be less than the Project.

(b) Operation

During operation, Alternative 4 would generate emissions associated with vehicle trips, heating, lighting, other electric and natural gas power requirements, emergency generators, and architectural coatings. Alternative 4 would incorporate

Project Design Feature GHG-PDF-1 (Green Building Features) and would comply with SCAQMD Rule 1113 regarding architectural coatings.

NOx emissions would be 76 and 79 pounds per day for the Project and the Project with the East Site Hotel Option, respectively. The daily impact threshold for NOx is 55 pounds per day. Despite the reduction in land use intensity, Alternative 4 would result in more traffic than the Project and require a sizeable generator that, along with its collective NOx generating sources, are expected to be above 55 pounds per day. Alternative 4 would implement the same Mitigation Measure AQ-MM-2 as the Project to reduce operational NOx levels to a less-than-significant level. Similar to the Project, Alternative 4 would not exceed the SCAQMD numerical significance thresholds for VOC, CO, SOx, PM10, and PM2.5. Thus, as with the Project, impacts under Alternative 4 would be less than significant after mitigation for these criteria pollutants. However, because of its increased mobile source emissions, impacts under Alternative 4 with respect to cumulative increases in criteria pollutants and violations of air quality standards would be greater than Project.

(iii) Exposure of Sensitive Receptors to Pollutant Concentrations

(a) Localized Emissions

As with the Project, Alternative 4 would generate localized emissions during construction and operation. It can be expected that maximum daily localized construction emissions would be similar to the Project. However, because of its smaller scale and intensity, localized operational emissions under Alternative 4 would be less than the Project. As with the Project, maximum localized emissions associated with grading and architectural coatings during construction and charbroilers, landscaping, coatings, and use of consumer products, and other sources at sensitive receptors would be below the localized screening thresholds for NO_X, CO, PM10, and PM2.5, including at the nearest receptors adjacent to the Project Site. Therefore, similar to the Project, with respect to localized construction and operational emissions, impacts to sensitive receptors would be less than significant under Alternative 4. Based on energy consumption modeling for Alternative 4, natural gas usage in Alternative 4 would be approximately 2 percent less and approximately 12 percent less when compared to the Project and the Project with the East Site Hotel Option, respectively.[37] Generally, natural gas usage is an indicator of localized emissions. While natural gas usage would be lower under Alternative 4, Alternative 4 would reduce the scale of construction and overall building massing as compared to the Project. Thus, the difference in emissions would not be substantively different such that impacts to sensitive receptors would be materially different under Alternative 4 with respect to localized

37 Refer to Appendix R, Alternative Analyses, for CalEEMod operational energy demand worksheets for Alternative 4.

emissions compared to the Project. For these reasons, impacts under Alternative 4 would be similar to the Project.

(b) Carbon Monoxide Hotspots

Vehicle trips would be higher under Alternative 4 than the Project. As discussed in Section IV.B, *Air Quality*, the intersection of Vine Street and Sunset Boulevard would have a maximum traffic volume of approximately 78,380 ADT under the Project buildout scenario and a maximum traffic volume of approximately 78,420 under the Project with the East Site Hotel Option scenario based on future year 2027 traffic volumes. Total traffic volumes would likely have to more than double to cause or contribute to a CO hotspot impact. As with the Project, Alternative 4 would not cause traffic volumes to double at the maximum impacted intersection. Thus, similar to the Project, Alternative 4 would not cause or contribute considerably to the formation of CO hotspots, and impacts would be less than significant. However, because Alternative 4 would increase the Project's daily vehicle trips, impacts would be greater than the Project.

(c) Toxic Air Contaminants

(i) Construction

Under Alternative 4, as with the Project, temporary TAC emissions associated with DPM emissions from heavy construction equipment would occur during construction activities. Mitigation Measure AQ-MM-1 would require utilization of off-road diesel-powered construction equipment that meets or exceeds the most stringent and environmentally protective CARB and USEPA Tier 4 off-road emissions standards. The Tier 4 standards would reduce DPM emissions by approximately 81 to 96 percent compared to equipment that meet the Tier 2 off-road emissions standards. As with the Project, with implementation of the required mitigation, Alternative 4 would not expose sensitive receptors to substantial TAC concentrations and impacts would be less than significant. However, because Alternative 4 would reduce the scale and duration of construction activities, impacts under Alternative 4 would be less than the Project.

(ii) Operation

Alternative 4, as with the Project, would use consumer products and architectural coatings or involve other sources, such as charbroiling associated with restaurant uses. TAC emissions from these sources are anticipated to be minimal and all restaurant emissions would be regulated under SCAQMD Rule 1138. In addition, Alternative 4 would provide stationary emergency generators for its buildings. The emergency generators would result in emissions during maintenance and testing operations. Emergency generators are permitted by the SCAQMD and regulated under SCAQMD Rule 1470. Maintenance and testing would occur periodically, up to 50 hours per year per Rule 1470. As with the Project, Alternative 4's land uses would not include installation of industrial-sized paint booths or require extensive

use of commercial cleaning products. Alternative 4 would generate only minor amounts of diesel emissions from mobile sources (non-on-site construction vehicles), such as delivery trucks that would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. Furthermore, trucks would be required to comply with the applicable provisions of the CARB 13 CCR, Section 2025 (Truck and Bus regulation) to minimize and reduce PM and NO_X emissions from existing diesel trucks. However, with a higher number of hotel units and its office component, there would be more delivery trucks to the Project Site under Alternative 4 than the Project. Nonetheless, toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the uses expected on the Project Site, as with the Project, potential long-term operational impacts associated with the release of TACs under Alternative 4 would be minimal, regulated, and controlled, and would not be expected to exceed the applicable SCAQMD numerical significance thresholds. Operation of Alternative 4, as with the Project, would not expose sensitive receptors to substantial TAC concentrations, and operational impacts would be less than significant. Accordingly, impacts with respect to TAC emissions under Alternative 4 would be similar to the Project.

(d) Other Emissions Affecting a Substantial Number of People

Activities under Alternative 4 would potentially generate other emissions, such as those leading to odors. These may include the use of architectural coatings and solvents, as well as the combustion of diesel fuel in on-and off-road equipment. SCAQMD Rule 1113 would limit the amount of VOCs in architectural coatings and solvents. In addition, Alternative 4 would comply with the applicable provisions of the CARB Air Toxics Control Measure regarding idling limitations for diesel trucks. Through mandatory compliance with SCAQMD rules, construction activities and materials are not expected to result in emissions that would create objectionable odors affecting a substantial number of people. Operation of Alternative 4 would not involve land uses typically associated with odor complaints, such as agricultural uses or food processing plants, or any uses identified by the SCAQMD as being associated with substantial odors. As with the Project, Alternative 4 is not expected to discharge contaminants into the air in quantities that would cause a nuisance, injury, or annoyance to the public or property pursuant to SCAQMD Rule 402. Therefore, as with the Project, odor and other emissions impacts under Alternative 4 would be less than significant. Accordingly, impacts with respect to other emissions under Alternative 4 would be similar to the Project.

(c) Cultural Resources

As cultural resources impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of

Alternative 4 apply to both the Project and the Project with the East Site Hotel Option.

(i) Historical Resources

As with the Project, Alternative 4 would not demolish or cause an adverse material change in the eligibility of any historical resources within the Project Site due to direct impacts. Building heights under Alternative 4 (12 stories on the East Site and 20 stories on the West Site) would be lower than the Project and, thus, more consistent with Hollywood's existing built environment than the Project, which would result in 46- and 35-story buildings on the East Site and West Site, respectively. Compared to the Project, Alternative 4 would have less effect related to contrasting building heights, although potential indirect impacts associated with this contrast under the Project would be less than significant. Therefore, as with the Project, indirect impacts associated with contrasting building heights would be less than significant under Alternative 4 however, impacts would be incrementally less under Alternative 4 than the Project because of the reduction in building heights.

As with the Project, Alternative 4 would also result in temporary alterations to the Hollywood Walk of Fame and potentially significant and unavoidable impacts due to structural vibration at nearby historical resources during construction. As with the Project, impacts associated with Alternative 4 could be reduced to less-than-significant with implementation of Mitigation Measures CUL-MM-1, CUL-MM-2, and NOI-MM-4. As with the Project, the mitigation available for Alternative 4 would avoid significant impacts on the Capitol Records Building and Gogerty Building and would provide similar protections to the other proximate historical buildings subject to potential structural damage from vibration, as follows: the Pantages Theatre, Avalon Hollywood, and the building located at 6316-24 Yucca Street/Art Deco Storefront. However, because Mitigation Measure CUL-MM-2 and Mitigation Measure NOI-MM-4 require the consent of other property owners, who may not agree to participate in their implementation, it is conservatively concluded that structural vibration and settlement impacts on proximate historical resources would remain significant and unavoidable after implementation of mitigation measures. Nonetheless, because Alternative 4 would reduce the extent and duration of the Project's building construction, vibration impacts under Alternative 4 would be less than the Project, and, thus, impacts to historical resources under Alternative 4 would be less than the Project.

(ii) Archaeological Resources

As with the Project, excavation associated with Alternative 4 would reach depths of approximately 64 feet on the East and West Sites. Similar to the Project, these excavations would cut into the historic fill layer, as well as previously undisturbed native soils. Such depths have the potential to encounter prehistoric and/or historic archaeological resources. Alternative 4, as with the Project, would implement

Mitigation Measures CUL-MM-3 through CUL-MM-5. With the implementation of these measures, Alternative 4, as with the Project, would provide for appropriate treatment and/or preservation of resources if encountered. Under Alternative 4, as with the Project, potentially significant impacts to archaeological resources would be mitigated to a less-than-significant level. Thus, impacts related to archaeological resources under Alternative 4 would be similar to the Project.

(iii) Human Remains

As with the Project, excavation associated with Alternative 4 would reach depths of approximately 64 feet on the East Site and West Site. Pursuant to California Health and Safety Code Section 7050.5, Public Resources Code 5097.98, and California Code of Regulations Section 15604.5(e), any discovery of unrecorded human remains would require the immediate halting of construction or ground-disturbing activities and notification of the County Coroner. If the remains are determined to be Native American in origin, a "Most Likely Descendent" would be contacted to assist in determining appropriate treatment for the remains. In the event of the discovery of unrecorded human remains during construction, compliance with applicable regulatory requirements would ensure potential impacts are less than significant. Thus, Alternative 4, as with the Project, would have a less-than-significant impact with respect to human remains. Therefore, impacts with respect to human remains under Alternative 4 would be similar to the Project.

(d) Geology and Soils

As geology and soils impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 4 apply to both the Project and the Project with the East Site Hotel Option.

(i) Seismic Hazards

The Project Site is located within the designated Alquist-Priolo Earthquake Fault Zone for the Hollywood Fault; however, underlying soil horizons indicate the Project Site has not experienced fault movement for at least 120,000 years and active faulting does not occur beneath the Project Site. Similar to the Project, excavation for Alternative 4's subterranean parking would remove the loose sand deposit and require suitable engineered stabilization in accordance with applicable City and CBC building regulations. The Project Site is not located within a designated landslide area, and the potential for landslide and seismically induced slope instability at the Project Site is considered to be low. As with the Project, Alternative 4's application of appropriate engineering controls and compliance with regulations for planned excavation and construction would minimize any potential site stability geologic hazards at the Project Site. Therefore, development of Alternative 4, as with the Project, would not result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury caused in

whole or in part by exacerbation of existing environmental conditions. As with the Project, impacts related to geologic conditions under Alternative 4 would be less than significant through proper engineering methods and compliance with City and CBC building regulations. With implementation of building regulations and recommendations of applicable final geotechnical reports, impacts with respect to seismic hazards under Alternative 4 would be similar to the Project.

(ii) Soil Erosion or Loss of Topsoil

As with the Project, excavation for parking structures associated with Alternative 4, would reach depths of approximately 64 feet on the East and West Sites. Similar to the Project, construction of Alternative 4 would increase soil exposure and risk of soil erosion. The potential for water erosion under Alternative 4 would be reduced by the implementation of standard erosion control measures during site preparation and grading activities. Construction activities would be carried out in accordance with applicable City standard erosion control practices required pursuant to the CBC and the requirements of the NPDES Construction General Permit issued by the LARWQCB, as applicable. In accordance with these requirements, a SWPPP would be prepared that incorporates BMPs to control water erosion during the construction period. Following construction, the Project Site would be covered completely by paving, structures, and landscaping, which would not leave any exposed areas of bare soil susceptible to erosion. Thus, similar to the Project, impacts due to erosion of topsoil would be less than significant under Alternative 4. Alternative 4, like the Project, would comply with CBC building regulations and implement a SWPPP and BMPs and, as with the Project, would result in less than significant soil erosion impacts. Based on the above, impacts under Alternative 4 would be similar to the Project.

(iii) Unstable Geologic Units

Alternative 4, as with the Project, would include sloped excavations properly shored in accordance with applicable provisions of the CBC to minimize the potential for site stability hazards during temporary excavation activities. As with the Project, Alternative 4 would not be located on an unstable geologic unit. In addition, Alternative 4 would comply with CBC requirements and, prior to issuance of a grading permit, a qualified geotechnical engineer must prepare and submit to the LADBS a Final Geotechnical Report that includes site-specific design recommendations for seismic safety and design requirements for foundations, retaining walls/shoring and excavation to meet applicable State and City code and regulations. As with the Project, through adherence to the CBC and the recommendations of the Final Geotechnical Report, impacts with respect to geologic units under Alternative 4 would be less than significant and similar to the Project.

(iv) Expansive Soils

Similar to the Project, Alternative 4 would encounter and remove near surface soils that have a low to medium potential for expansion during excavation activities. In addition, expansive soil hazards would be further evaluated for the Project Site as part of the LADBS approved Final Geotechnical Report that would include site-specific design recommendations for addressing expansive soils, as needed. Further, as with the Project, compliance with standard construction and engineering practices, and proper engineering erosion control and drainage design would ensure that hazards associated with potential expansive soils or corrosive soils are properly addressed. As such, as with the Project, impacts related to expansive soils or corrosive soils under Alternative 4 would be less than significant and similar to the Project.

(v) Paleontological Resources

As with the Project, Alternative 4, would require excavations extending to 64 feet for subterranean parking. Thus, Alternative 4, as with the Project could access high sensitivity alluvial sediments. This classification indicates a high potential for fossils to be present in the subsurface. Similar to the Project, implementation of Mitigation Measures GEO-MM-1 through GEO-MM-3 under Alternative 4, would provide for appropriate treatment and/or preservation of resources and would mitigate impacts to paleontological resources to less-than-significant. As excavation depths would be similar under Alternative 4, impacts related to paleontological resources would be similar to the Project.

(e) Greenhouse Gas Emissions

Despite the Project and the Project with the East Site Hotel Option having slightly different overall GHG emissions, because impact conclusions and significance levels related to GHG emissions would be the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 4 apply to both the Project and the Project with the East Site Hotel Option.

The construction and occupancy of the Project Site under Alternative 4, as with the Project, would increase GHG emissions over existing conditions. As with the Project, Alternative 4 would incorporate GHG reduction characteristics, features, and measures. Although the State and City have not established quantitative values for GHG emissions, in order to comply with policies and regulations adopted for the purpose of reducing or mitigating GHG emissions, Alternative 3, as with the Project, would incorporate AQ-PDF-1, AQ-PDF-2 and GHG-PDF-1. Despite its smaller scale, Alternative 4 would result in increased traffic and higher mobile emissions, and, thus, maximum GHG operational emissions would be higher than the Project. With incorporation of applicable Project Design Features, GHG emission impacts under Alternative 4, as with the Project, would be less than

significant. Due to its higher GHG emissions, impacts under Alternative 4 with respect to GHG emissions on the environment would be greater than the Project.

Alternative 4, as with the Project, with incorporation of AQ-PDF-1, AQ-PDF-2 and GHG-PDF-1, would be consistent with applicable strategies outlined in CARB's Climate Change Scoping Plan, SCAG's 2016-2040 RTP/SCS, Sustainable City pLAn, and the City's Green Building Code. As such, similar to the Project, impacts related to conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs would be less than significant under Alternative 4. As discussed under the Transportation subsection, below, Alternative 4 would result in employee 5.0 VMT per capita. The Project would result in 4.8 household per capita VMT and the Project with the East Site Hotel Option would result in a 4.7 household per capita VMT and 4.8 work VMT per employee. As such, Alternative 4 would not exceed the Central APC's employee threshold standard of 7.5. However, Alternative 4 with its higher work VMT per employee and as an all-commercial use would not meet the objectives of adopted policies and land use strategies to reduce GHGs through mixed-use development within the TPA to the same extent as under the Project, and thus, impacts related to GHG reduction policies would be greater than the Project.

(f) Hazards and Hazardous Materials

As impacts related to hazards and hazardous materials would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 4 apply to both the Project and the Project with the East Site Hotel Option.

(i) Hazards to the Public or Environment through the Routine Transport, Use, or Disposal of Hazardous Materials

Construction of Alternative 4, as with the Project, would include demolition of existing parking surfaces and structures other than the Capitol Records Complex. Construction equipment and materials, such as fuels, oils and lubricants, solvents and cleaners, adhesives, paints and thinners, degreasers, cement and concrete, and asphalt mixtures, which are all commonly used in construction, would be used, stored, and disposed of in consumer quantities and in accordance with applicable laws and regulations and manufacturers' instructions. As with the Project, operation of Alternative 4 would involve the limited use of potentially hazardous materials typical of those used in residences, offices, hotels and restaurants, including cleaning agents, paints, pesticides, and other materials used for landscaping. In addition, hazardous materials on the Project Site would continue to be acquired, handled, used, stored, and disposed of in accordance with all manufacturers' specifications and all applicable federal, State, and local requirements. Compliance with all applicable regulations concerning the transport, use, and disposal of hazardous waste under Alternative 4, as with the Project,

would reduce hazardous materials impacts to a less-than-significant level. While Alternative 4 and the Project would similarly comply with the same regulations, because Alternative 4 would reduce the scale of the Project's construction and operational activity (e.g., use less volume of the hazardous chemicals needed for construction and daily maintenance), impacts would be less under Alternative 4 than the Project.

(ii) Hazard to the Public or Environment Involving the Accidental Release of Hazardous Materials into the Environment

As with the Project, Alternative 4 would require excavation of soil for up to five levels of subterranean parking. Such excavation could expose the public or the environment to contaminated soils and soil vapors, and could reveal remnant steel structures and/or possibly USTs associated with historic automobile gas and service stations. As with the Project, under Alternative 4, Mitigation Measure HAZ-MM-1 (Soil Management Plan), would be implemented and would establish policy and requirements for the disposal of contaminated soils and management of soil vapors or other gases during excavation activities. Therefore, impacts under Alternative 4 related to the accidental release of hazardous materials during construction would be less than significant after mitigation and similar to the Project.

(iii) Hazard Resulting from Hazardous or Acutely Hazardous Materials, Substances, or Waste within One-Quarter Mile of a School

Alternative 4, as with the Project, is not located within one-quarter mile of a school. Similar to the Project, Alternative 4 would implement Mitigation Measure HAZ-MM-1 (Soil Management Plan), which would establish policy and requirements during construction for the disposal of contaminated soils and management of soil vapors or other gases during excavation activities. Also, similar to the Project, Mitigation Measure AQ-MM-1 would be implemented under Alternative 4 requiring the use of Tier IV construction equipment to minimize TAC emissions. In addition, during operation Alternative 4 would not require the handling of acutely hazardous materials or result in the emission of hazardous materials other than, potentially, VOCs. associated with diesel vehicles and consumer products (e.g., architectural coatings, household cleaners, landscaping fertilizers and pesticides, etc.). Alternative 4, as with the Project, during operation would only require the limited use of potentially hazardous materials associated with domestic maintenance and landscaping. In addition, Alternative 4 would comply with applicable local, State, and Federal laws and regulations relating to the use of hazardous or acutely hazardous materials and would implement Mitigation Measure HAZ-MM-1 (Soils Management Plan) to ensure that any existing vapors or materials within the existing site would be safely managed. Therefore, as with the Project, impacts

related to the use of hazardous or acutely hazardous materials within a quarter mile of a school under Alternative 4 would be less than significant and similar to the Project.

(iv) Hazardous Materials Sites

Alternative 4, similar to the Project, would not involve construction or alter existing activities on a hazardous materials site compiled pursuant to Government Code Section 65962.5. Accordingly, Alternative 4 and the Project would have no impact with regard to development occurring on a hazardous materials site. Thus, impacts related to development on a hazardous materials site under Alternative 4 would be similar to the Project.

(v) Emergency Response Plan/Emergency Evacuation Plan

Alternative 4, as with the Project, would involve new construction and increased traffic. Alternative 4, as with the Project, would not however, affect the City's Emergency Operations Plan or established disaster evacuation routes, the nearest of which are Santa Monica Boulevard approximately 0.8 miles to the south and Highland Avenue approximately 0.6 miles to the west. As with the Project, Alternative 4 would not require any policy or procedural changes to the City of Los Angeles Emergency Operations Plan or the City's established disaster routes. Also, during an unanticipated disaster event, the LAPD and LAFD would implement operational protocols, as well as plans and programs, on a case-by-case basis, to facilitate emergency evacuations and/or response, which would consider traffic conditions at the time of the emergency. In such instances, traffic would be routed along the City's numerous disaster routes, as determined appropriate by the responding City agencies. Similar to the Project, construction and operation of Alternative 4 would not close any existing streets or otherwise represent a significant impediment to emergency response or evacuation of the local area. Construction of Alternative 4, as with the Project, would occur within the boundaries of the Project Site and within the rights-of-way of adjacent streets, including the median within Vine Street and signal installation along Argyle Avenue. Temporary partial lane closures are not anticipated to significantly affect the circulation of emergency vehicles, which normally have a variety of options for dealing with traffic and congestion, such as sirens, priority use of the roadway, and use of alternate routing. In addition, Alternative 4, as with the Project, would implement Project Design Feature TRAF-PDF-2, which requires preparation of a Construction Traffic Management Plan and includes street closure information, a detour plan, haul routes, and a staging plan. The Construction Traffic Management Plan will be submitted to the City for review and approval. With Project Design Feature TRAF-PDF-2, construction of Alternative 4, like the Project, would not substantially impede public access, create severe consequences for emergency response vehicles, substantially impede travel upon a public right-of-way, or interfere with an adopted emergency response or evacuation plan. During

operation, Alternative 4, as with the Project, would be required to establish, implement, and maintain an emergency response plan. The emergency response plan, which would be submitted to the LAFD for inspection and approval prior to implementation, would be inspected annually by the LAFD and include evacuation procedures. In addition, the California Fire Code, Chapter 10, Means of Egress, requires that all habitable structures comply with the California Fire Code, including providing ingress and egress during emergencies. As with the Project, compliance with existing regulations would ensure that an adequate emergency response plan is established for Alternative 4. Overall, as with the Project, impacts under Alternative 4 with respect to conflicts with or interfering with emergency response or evacuation plans would be less than significant. However, because Alternative 4 would generate more daily vehicle trips and result in higher occupancy than the Project, impacts with regard to emergency response would be greater than the Project.

(g) Hydrology and Water Quality

As hydrology and water quality impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 4 apply to both the Project and the Project with the East Site Hotel Option.

(i) Water Quality

(a) Construction

Alternative 4, as with the Project, would include construction activities, including earth moving, maintenance/operation of construction equipment, potential dewatering, and handling/storage/disposal of materials, that could contribute to pollutant loading in stormwater runoff from the construction site. Also, wind could convey exposed and stockpiled soils at the construction site into nearby storm drains during storm events, and on-site water activities for dust suppression purposes could contribute to pollutant loading in runoff from the construction site. Alternative 4, as with the Project, would excavate for subterranean garages to depths of approximately 64 feet, with both reaching deeper levels for foundation features. Groundwater depths range from less than 49.2 bgs to approximately 98.3 feet bgs across the Project Site. Alternative 4, as with the Project, has the potential to encounter groundwater during construction. Dewatering, which is subject to LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, may be required. The potential impact related to pollutant loading or groundwater quality that would cause exceedances of water quality standards would be reduced to less-than-significant levels for Alternative 4, as well as the Project, through compliance with regulatory requirements, BMPs, and Building Code grading procedures. However, because the construction footprint and the depth of excavation under Alternative 4 would be similar to the

Project, the potential exposure of excavated soils to the elements and encroachment into the water table would be similar to the Project. As such, the potential impact with respect to violations of water quality standards during construction under Alternative 4 would be similar to the Project.

(b) Operation

Alternative 4, as with the Project, would incorporate a drainage collection and conveyance system that would detain and treat/filter runoff in compliance with the City's LID Manual requirements to reduce the quantity of, and improve the quality of, rainfall runoff leaving the Project Site. With the implementation of such system and BMPs, Alternative 4, as with the Project, would result in an improvement in the quality of stormwater runoff from the Project Site compared to existing conditions. As with the Project, impacts related to water quality standards under Alternative 4 would be less than significant, and would be similar to the Project.

(ii) Decreases in Groundwater Supplies or Recharge

Alternative 4, as with the Project, would not require groundwater withdrawal. However, similar to the Project, excavation for the foundations and the subterranean garages during construction of Alternative 4 would have the potential to intercept the groundwater table and, as such, some groundwater removal may be required during construction. Such dewatering during construction would not result in the substantial removal of groundwater that would reduce the local groundwater table. Further, dewatering would only occur temporarily during construction and would not continue post-construction.

Under Alternative 4, as with the Project, subterranean parking would be below the redeveloped areas of the Project Site, resulting in no material change to the amount of stormwater that would percolate into the groundwater table compared to existing conditions. Therefore, similar to the Project, pre- and post-Project infiltration volumes are considered effectively equivalent under Alternative 4. Accordingly, similar to the Project, there would not be a substantial reduction in groundwater recharge from current conditions, and Alternative 4 would not introduce activities that could impede sustainable groundwater management of the basin.

Overall, neither Alternative 4 nor the Project would cause substantial depletion of groundwater supplies or substantially interfere with groundwater recharge. Therefore, the impact regarding groundwater recharge or depletion under Alternative 4 would be less than significant and similar to the Project.

(iii) Alteration of Drainage Pattern

(a) Construction

Alternative 4, as with the Project, would include construction activities that could contribute to erosion or siltation if soils are exposed during development of the Project Site. Alternative 4 would require similar excavation and export of materials as under the Project. Similar to the Project, Alternative 4 would cause a temporary increase in permeable surfaces during construction that would reduce, rather than increase, off-site runoff from the Project Site during a portion of the construction. As with the Project, construction BMPs to manage runoff flows and avoid on- or off-site flooding, would be implemented under Alternative 4. As with the Project, the BMPs would reduce runoff that would potentially create or contribute runoff water exceeding the capacity of existing or planned stormwater drainage systems under Alternative 4. Although the overall duration of construction activities would be less under Alternative 4 than the Project, the maximum off-site flow of Alternative 4 and the impact regarding stormwater drainage system capacity would be similar to the Project and less than significant. With implementation of BMPs, impacts with respect to surface runoff, siltation, rates of runoff and capacity of drainage systems under Alternative 4, as with the Project, would be less than significant. Overall, impacts would be similar to the Project.

(b) Operation

Alternative 4, as with the Project, would largely maintain existing drainage patterns at the Project Site. As with the Project, Alternative 4 would include a drainage system that meets City stormwater retention, treatment and runoff requirements, including all applicable LID requirements. Additionally, under Alternative 4, as with the Project, a reduced peak flow rate of stormwater runoff from the Project Site would occur due to the retention afforded by the proposed LID system and LID BMPs. Due to similarity in site coverage and in the proposed stormwater retention system, the volume of stormwater runoff from the Project Site requiring conveyance by the existing off-site storm drain system would decrease to the same extent under Alternative 4 as with the Project. Therefore, impacts under Alternative 4 would be less than significant and similar to the Project.

(iv) Pollutant Release in Flood Hazard, Tsunami, or Seiche Zones

The Project Site is not located within a 100-year floodplain and is not in a tsunami zone and would not be subject to such flooding hazards. The Project Site is located approximately one mile from the Hollywood Reservoir. Given the distance to the Hollywood Reservoir, any oscillation and subsequent release of water within the reservoir as part of a seiche would not inundate the Project Site. Thus, there would be no potential for risk of release of pollutants due to inundation by seiche.

The Project Site is located within the Hollywood Reservoir inundation area.[38] In compliance with applicable regulatory requirements, Alternative 4, as with the Project, would implement BMPs to minimize pollutants within the Project Site during construction. Post-construction, the nature of pollutants would be typical of other developed sites within the dam inundation area. Dam safety regulations executed by the California Department of Water Resources and other agencies are the primary means of reducing damage or injury due to inundation occurring from dam failure, and reduce the likelihood of inundation. Regarding pollutant release, because Alternative 4, as with the Project, would actively maintain a stormwater management system and would be entirely developed with enclosed parking, buildings, and established landscaping, the exposure of flood waters to pollutants would be minimized. Thus, in the unlikely event of on-site inundation, Alternative 4, like the Project, would not result in the release of significant types or quantities of pollutants. As with the Project, impacts with respect to a significant risk of release of pollutants to inundation by flooding, tsunami, or seiche under Alternative 4 would be less than significant and similar to the Project.

(v) Implementation of Water Quality Control Plans

Alternative 4, as with the Project, would incorporate into its design an on-site drainage system that would be consistent with water quality control plans, the policies of which are expressed in City and State water quality regulations for the protection of water resources. Alternative 4, as with the Project, falls within the jurisdiction of water quality plan regulations that assure that development projects are in compliance with clean water policies. These plans and regulations include the LARWQB (Region 4) Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties; and the NPDES stormwater permitting program. In compliance with the City's LID requirements, Alternative 4, as with the Project, would install a capture and reuse system on each site. The detention would temporarily store the captured stormwater until the stored volume is entirely used through the irrigation system. The on-site drainage system would also provide BMPs in accordance with the City's LID requirements. As with the Project, impacts related to water quality control plans under Alternative 4 would be less than significant and similar to the Project.

(h) Land Use and Planning

As land use impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 4 apply to both the Project and the Project with the East Site Hotel Option.

38 California Department of Water Resources, Division of Safety of Dams, Dam Inundation Map for Mulholland Dam, https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2, accessed March 15, 2020.

Alternative 4 proposes up to 789,967 square feet of office, hotel, and retail/restaurant floor area, with an approximate FAR of 4.501:1 and 36,551 feet of publicly accessible open space. The Project proposes up to 1,287,150 square feet of residential and commercial floor area with an approximate FAR of 6.973:1.[39] As with the Project, to allow for development of Alternative 4, the zoning would be amended to C2-2-SN to eliminate the D Limitation, which limits FAR to 3:1 and 2:1 on certain parcels. As with the Project, Alternative 4 would require a Conditional Use Permit to allow FAR averaging to be calculated as a whole rather than by individual parcel or lot. As with the Project, Alternative 4 would not conflict with applicable 2016-2040 RTP/SCS goals to facilitate land use patterns that link land use and sustainable transportation options or the Framework Element Regional Center designation and policies that support a diversity of land uses, and provide for the spatial distribution of development that promotes a reduction of vehicle trips, VMT, and air pollution. Although Alternative 4 would not further regional and local policies to provide housing as under the Project, the overall density and location of Alternative 4, as with the Project, would not conflict with policies of local and regional land use plans adopted to avoid or mitigate environmental effects. Therefore, impacts with respect to land use would be less than significant under Alternative 4 and similar to the Project.

(i) Noise

Maximum daily construction noise and vibration levels would be similar under the Project and the Project with the East Site Hotel Option. While the Project and the Project with the East Site Hotel Option would have nominally different daily operational mobile source noise levels, the impact conclusions, significance levels, and mitigation measures are the same for the Project and the Project with the East Site Hotel Option. Accordingly, the below comparisons of impacts of Alternative 3 apply to both the Project and the Project with the East Site Hotel Option.

(ii) Noise Levels in Excess of Standards

(a) Construction

As with the Project, Alternative 4 would entail construction activities and excavations for subterranean garages up to 64 feet deep on the East and West Sites. These activities would require the use of heavy-duty machinery. Similar to the Project, maximum construction activities under Alternative 4 would increase noise levels at several sensitive receptor locations in the area. As with the Project, because the maximum amount of construction equipment operating simultaneously within the Project Site would be constrained by the size of the property, the maximum construction noise levels under Alternative 4 would be similar to the Project. Based on a conservative impact analysis, in which noise levels were calculated with all pieces of construction equipment operating

[39] The Project with the East Site Hotel Option would provide 1,277,741 square feet of total floor area.

simultaneously and located at the construction area nearest to the affected receptors, construction noise levels would exceed the applicable noise significance thresholds at several nearby noise sensitive receptors. Therefore, as with the Project, Alternative 4 would implement Mitigation Measures NOI-MM-1 to NOI-MM-3 to reduce construction noise impacts at off-site noise sensitive receptors to the extent technically feasible. However, as with the Project, with implementation of technically feasible mitigation, construction noise impacts at noise-sensitive receptors 1, 3, and 5 through 13 (eleven sites) would still exceed the significance threshold under Alternative 4. Therefore, as with the Project, construction noise impacts associated with on-site noise sources would remain temporarily significant and unavoidable for Alternative 4. Similar to the Project, maximum construction traffic would not result in significant noise levels (greater than 5 dBA L_{eq}) compared to existing traffic noise levels along any of the studied roadway segments, and impacts would be less than significant. Although construction noise levels associated with on-site noise sources would be significant and unavoidable under Alternative 4, Alternative 4 would have a shorter overall construction due to its reduced scale of development. As such, impacts related to construction noise under Alternative 4 would be less than the Project.

(b) Operation

Alternative 4, as with the Project, would increase off-site traffic and generate on-site composite noise associated with fixed equipment, vehicle activity, and human outdoor activity. However, Alternative 4 would increase overall off-site vehicle trips per day from a maximum of 4,504 trips per day (Project with the East Site Hotel Option) to 5,350 trips per day under Alternative 4 (an approximately 19 percent increase), therefore operational mobile source noise impacts would be greater under Alternative 4 than the Project with the East Site Hotel Option. It is acknowledged that differences in off-site mobile source noise level increases along the studied roadway segments under the Project and the Project with the East Site Hotel Option would be negligible and less than 0.1 dBA CNEL for all analyzed roadway segments. Assuming a 19 percent increase in Alternative 4-related daily vehicle trips on the analyzed roadway segments, compared to the Project with the East Site Hotel Option, the maximum increase in Alternative 4-related traffic noise levels over Future (2040) traffic noise levels would be approximately 0.7 dBA CNEL (from 63.9 to 64.6 dBA CNEL) along Ivar Avenue between Hollywood Boulevard and Selma Avenue and would not exceed the significance threshold of 5 dBA CNEL. Comparatively, the Project with the East Site Hotel Option (or the Project) would result in a 0.6-dBA increase along this same roadway segment in 2040. This difference in mobile source noise would not be perceptible, and, as such, traffic noise impacts under Alternative 4 would be less than significant and similar to the Project.

While there would be no residential units and increased office/hotel uses under Alternative 4 compared to the Project, the difference in uses is not anticipated to

result in a perceptible noise level (greater than 3 dBA) difference at off-site noise sensitive receptors. Alternative 4 would also include a paseo but without a performance stage near the "Hollywood Jazz: 1945-1972" mural, and, as such, performance-related noise from this area of the paseo would not occur. However, similar to the Project, any outdoor performances under Alternative 4 would be subject to the noise restrictions in NOI-PDF-3, which would limit noise levels from adversely affecting nearby noise sensitive receptors. Thus, noise, in general, generated from the paseo under Alternative 4 at off-site noise sensitive locations would be largely similar to the Project with the outdoor performance sound restrictions in place. As such, noise generated from the paseo under Alternative 4 would be the same or less than the Project when considering no on-site residents would attend these events under Alternative 4. Overall, composite operational noise levels would be less than significant and similar to the Project.

(iii) Groundborne Noise and Vibration

(a) Construction

Construction of Alternative 4, as with the Project, would generate groundborne construction vibration during construction activities when heavy construction equipment is used. As with the Project, the estimated vibration velocity levels from all construction equipment (maximum construction conditions) under Alternative 4 would be below the building damage significance criteria at off-site building structures west and east of the West Site and East Site construction areas. However, as with the Project, the estimated construction vibration levels under Alternative 4 would exceed the significance threshold at the Avalon Hollywood, the Pantages Theatre, the Yucca Street Art Deco Building Storefront, the AMDA Vine building, the Argyle House, the Commercial Building at 1718 Vine Street, the Capitol Records Building, and the Gogerty Building. Therefore, vibration impacts pursuant to the significance criteria for building damage, would be significant. As with the Project, with implementation of Mitigation Measure NOI-MM-4 and compliance with LAMC Section 91.3307.1, vibration impacts associated with Alternative 4 would be reduced to less-than-significant levels for the Capitol Records and Gogerty Buildings. However, similar to the Project, because consent of off-site property owners, who may not agree, would be required to implement the vibration mitigation for potential structural damage to their off-site structures, it is conservatively concluded that structural vibration impacts on the AMDA Vine Building, the Argyle House, the Commercial Building at 1718 Vine Street, the Pantages Theatre, Avalon Hollywood, and Art Deco Building Storefront would remain significant and unavoidable because it cannot be assured that all components of NOI-MM-4 can be implemented.

Regarding human annoyance, as with the Project, the estimated vibration levels due to maximum construction activity at the West Site under Alternative 4, would exceed the significance threshold for human annoyance at vibration sensitive receptors near the Project Site. Implementation of Mitigation Measure NOI-MM-

4, under Alternative 4, as with the Project, may lessen but would not reduce all human annoyance impacts to a less-than-significant level. Therefore, as with the Project, no feasible mitigation measures under Alternative 4 would reduce the temporary vibration impacts from on-site construction associated with human annoyance at the vibration-sensitive receptors 3, 5, 6, and 8 through 13. As with the Project, construction vibration levels would be significant and unavoidable under Alternative 4. However, because the overall scale of development would be reduced by approximately 38.6 percent under Alternative 4, the duration of construction and overall construction activity causing vibration would be less, and impacts under Alternative 4 would be less than the Project.

(b) Operation

Day-to-day operations under Alternative 4, as with the Project, would include typical commercial-grade stationary mechanical and electrical equipment, which would produce vibration at low levels that would not cause damage or annoyance impacts to on-site or off-site environment. Primary sources of transient vibration would include vehicle circulation within the proposed parking areas, which would be confined to the immediate area and would not be expected to be perceptible off the Project Site. It is anticipated that mechanical equipment, including air handling units, condenser units, and exhaust fans, under Alternative 4, as with the Project, would be located on building rooftops. Therefore, as with the Project, groundborne vibration from the operation of such mechanical equipment under Alternative 4 would not impact any of the off-site sensitive receptors. Thus, similar to the Project, operational vibration impacts under Alternative 4 would be less than significant. While Alternative 4 would have different uses than the Project, off-site groundborne operation vibration is not anticipated to be perceptible under Alternative 4, and, such, impacts under Alternative 4 would be similar to the Project.

(i) Population and Housing

During operation, the Project and the Project with the East Site Hotel Option would have different population, housing, and employment generation statistics. However, both development scenarios would result in the same impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of Alternative 4 apply to both the Project and the Project with the East Site Hotel Option.

Alternative 4 would increase occupancy and use of the Project Site for office and hotel purposes. Alternative 4 would provide 146,698 square feet of hotel floor area and 603,060 square feet of office floor area. The hotel uses would generate approximately 269 new employees[40], and the office uses would generate approximately 2,611 new employees for a total of 2,880 office and hotel

40 Based on HR&A Economic and Fiscal Impact Report evaluation in which the factor for the Project's hotel uses would be one employee per 545 square feet of hotel floor area.

employees.[41] In addition, it would provide 30,176 square feet of retail/restaurant use, which generate a total of approximately 206 new employees, for a total of 3,086 new employees.[42] Alternative 4 would not incorporate any residential development. By comparison, the Project would include 30,176 square feet of retail/restaurant uses, which would generate approximately 206 employees. The Project with the East Site Hotel Option, based on 130,278 square feet of hotel floor area would also generate approximately 239 employees[43] and its retail/restaurant uses would generate approximately 206 new employees, for a total of approximately 445 employees. As with the Project, additional employees may be associated with on-site security and maintenance under Alternative 4.

Alternative 4's 3,086 new employees would represent approximately 0.21 percent of SCAG's 2018-2027 employment growth projection of 146,255 and approximately 0.96 percent of SCAG's 2019-2040 employment growth projection of 320,375. As with the Project, Alternative 4 would concentrate large scale development within a TPA and provide the type of transit oriented development encouraged in the General Plan and SCAG 2016-2040 RTP/SCS policies. However, without a residential component, Alternative 4 would not advance local and regional planning objectives that promote infill development that support and provide a mix of uses in urban centers near public transit. Also, Alternative 4 would not assist the City in meeting its housing obligation under SCAG's RHNA allocation. Although SCAG population and housing projections would not be exceeded and no displacement would occur, because no housing is provided, Alternative 4 could result in the indirect need for new housing to be constructed elsewhere. This could generate potential environmental impacts associated with construction activity at other locations. Although Alternative 4's growth in employment would not exceed SCAG's employment growth projections and would be less than significant, impacts related to population and housing would be greater under Alternative 4 than the Project.

(j) Public Services

During operation, the Project and the Project with the East Site Hotel Option would have different service-related population statistics, such as number of residents or students. However, both development scenarios would result in the same impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of Alternative 4 apply to both the Project and the Project with the East Site Hotel Option, unless stated otherwise.

41 Based on LAUSD employee generation rate 0.00431 per square foot of high rise office uses (2,599 employees),

42 Based on HR&A Economic and Fiscal Impact Report evaluation in which the factor for the Project's retail/restaurant uses would be one employee per 147.2 square feet of floor area.

43 Based on HR&A Economic and Fiscal Impact Report evaluation in which the factor for the Project's retail/restaurant uses would be one employee per 545 square feet of hotel floor area.

(i) Fire Protection

Alternative 4, as with the Project, would involve construction activities and intensify the use of the Project Site so that it would increase demand on fire protection and emergency medical services, as well as potentially reduce emergency access. Alternative 4, as with the Project, would incorporate Project Design Feature TRAF-PDF-2 to provide a Construction Traffic Management Plan to improve vehicular access around the construction site. Project Design Feature TRAF-PDF-3 would identify and enforce parking location requirements for construction workers. The implementation of these Project Design Features would facilitate emergency access. As such, similar to the Project, construction under Alternative 4 would result in less-than-significant impacts with respect to emergency response times and emergency access.

During operation, Alternative 4 would generate 3,086 new employees. The Project would result in a population increase of 2,433 persons and 206 new employees.[44] The Project with the East Site Hotel Option would result in a population increase of 2,140 persons and 445 employees. As with the Project, Alternative 4 would comply with the applicable OSHA, Building Code, Fire Code, other LAMC, and LAFD requirements and recommendations, which would reduce demand on LAFD facilities and equipment without creating the need for new or expanded fire facilities. In addition, the Project Site is located within a highly urbanized area accessed via an established street system and within the LAFD's maximum prescribed response distances. Due to urban proximity and facilitated travel for high priority emergency calls, impacts on emergency response would not be significant. As with the Project, Alternative 4 would also be consistent with LAMC fire flow requirements. As such, as with the Project, Alternative 4 would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. Impacts under Alternative 4, as with the Project, would be less than significant. However, because of the increase in Project Site occupancy under Alternative 4, impacts related to fire protection services under Alternative 4 would be greater than the Project.

(ii) Police Protection

Alternative 4, as with the Project, would result in construction and operation activities that could affect emergency access and increase demand for police protection services. As with the Project, Alternative 4's construction phase, although of shorter duration than that of the Project, could increase potential demand for LAPD services related to theft or vandalism and increased worker activity, as well as construction traffic that could affect emergency response times.

44 Based on Citywide occupancy of 2.34 resident per household and LAUSD employee factors of 0.00431 employee per square foot of high rise office uses.

To reduce LAPD demand during construction, Alternative 4, as with the Project, would implement a number of security measures under Project Design Feature POL-PDF-1 to limit access to construction areas, including private security, construction fencing, and locked entry. Similar to the Project, construction activities under Alternative 4 may involve temporary lane closures or increase travel time due to flagging or stopping traffic to accommodate trucks entering and exiting the Project Site. Under Project Design Feature TRAF-PDF-2, a Construction Traffic Management Plan would ensure that adequate and safe access remains available at the Project Site during construction activities. Project Design Feature TRAF-PDF-3 would implement a Construction Worker Parking Plan to identify and enforce parking location requirements for construction workers. As with the Project, most construction staging for Alternative 4 would occur on the Project Site, and construction workers would generally start and end their work days in advance of peak traffic hours; thus, reducing their potential effect on traffic and emergency response times. Furthermore, construction-related traffic generated by Alternative 4, as with the Project, would not significantly impact LAPD response times within the Project vicinity as LAPD vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic during construction.

According to LAPD service population generation factors,[45] Alternative 4's 603,060 square feet of office floor area, 146,698 square feet of hotel floor area and 30,176 square feet of retail/restaurant floor area would generate a total of 2,340 persons (based on a total of 779,934 square feet of commercial uses). According to the same crime factors used for the Project, the increase in service population generated by Alternative 4 could result in 36 crimes per year. [46] In comparison the Project and the Project with the East Site Hotel Option would result in 49 and 48 crimes per year, respectively.

The LAPD determines the need for new officers based on a variety of non-definitive factors (i.e., shifts in station and/or patrol boundaries, ongoing staff changes, service populations and crime statistics may be considered when new officers are hired). Alternative 4, as with the Project, would incorporate Project Design Feature POL-PDF-2 to provide a 24-hour/seven-day security program to ensure the safety of its employees, hotel guests, and site visitors. These measures would reduce demand on police services during operation. Similar to the Project, with the implementation of these features, Alternative 4 would not increase police services demand to the extent that the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain

45 LAPD service population generation factors for commercial uses is 3 residents per 1,000 sf of commercial floor area.

46 Crime total rounded up to next whole number.[47] For the hotel use, the student generation rate of 0.254 student per 1,000 square feet is based on the Lodging rate as provided in Table 15 of the LAUSD 2018 Developer Fee Justification Study. The students are distributed as follows: 54 percent elementary school, 15 percent middle school, and 31 percent high school.

service. As such, Alternative 4, as with the Project, would not result in potential physical impacts associated with construction of police facilities and impacts with respect to police protection would be less than significant. However, under police occupancy factors, impacts to police protection services under Alternative 4 would be less than the Project.

(iii) Schools

Alternative 4 would generate approximately 346 elementary school students, 97 middle school students, and 200 high school students totaling 644 students.[47,48,49] In contrast, the Project and the Project with the East Site Hotel Option would generate 441 students and 424 students, respectively. Similar to the Project, the additional students under both the Project and Alternative 4 could potentially exceed the number of seats available at local schools. However, pursuant to Section 65995 of the California Government Code, the Project Applicant would be required to pay fees in accordance with SB 50. Payment of such fees is intended for the general purpose of addressing the construction of new school facilities, whether schools serving the Project are at capacity or not and, pursuant to Section 65995(h), payment of such fees is deemed to be full mitigation of a project's development impacts. As such, impacts to school facilities and services under Alternative 4 would, as with the Project, would be less than significant. However, because Alternative 4 would generate more school-age children than the Project, impacts on schools would be greater than the Project.

(iv) Parks and Recreation

Alternative 4 would not result in an increase in residential population but would generate approximately 3,086 new employees. As a non-residential use, Alternative 4 would have only a minor impact on local public parks and recreation facilities. A few of Alternative 4's employees or hotel guests could have an interest in visiting local parks and recreation facilities. This would not occur to a level that would impact the capacity of parks and recreation facilities in the area, compared to a respective residential use, such as the Project. In contrast, the Project and the Project with the East Site Hotel Option would generate approximately 2,433 new residents and 2,140 residents respectively. Similar to the Project, operation of Alternative 4 would not exacerbate the existing shortfalls in parkland relative to

47 For the hotel use, the student generation rate of 0.254 student per 1,000 square feet is based on the Lodging rate as provided in Table 15 of the LAUSD 2018 Developer Fee Justification Study. The students are distributed as follows: 54 percent elementary school, 15 percent middle school, and 31 percent high school.

48 For the restaurant/retail uses, the student generation rate of 0.610 student per 1,000 square feet is based on the Neighborhood Shopping Centers rate as provided in Table 15 of the LAUSD 2018 Developer Fee Justification Study. The students are distributed as follows: 54 percent elementary school, 15 percent middle school, and 31 percent high school.

49 For the office uses, the student generation rate of 0.969 student per 1,000 square foot is based on the Large High Rise Commercial Office rate Table 15 of the LAUSD 2018 Developer Fee Justification Study. The students are distributed as follows: 54 percent elementary school, 15 percent middle school, and 31 percent high school.

City standards to the extent that new or physically altered park or recreational facilities would need to be constructed, the construction of which would cause significant adverse physical environmental impacts. As with the Project, impacts with respect to parks and recreation would be less than significant under Alternative 4. However, since Alternative 4 would not result in a residential population gain, it would have less demand for parks and recreation facilities, and impacts would be less than the Project.

(v) Libraries

Alternative 4 would not result in an increase in residential population but would generate approximately 3,086 new employees. As a non-residential use, Alternative 4 would have only a minor impact on local public libraries. A few of Alternative 4's employees or hotel guests could have an interest in visiting local libraries or using library services. This would not occur to a level that would impact the capacity of libraries in the area, compared to a respective residential use, such as the Project. The LAPL has indicated they have no plans for a new branch library in the Project vicinity. As with the Project, there are also three libraries within one-mile of the of the Project Site which could serve Alternative 4 or the Project. Furthermore, in consideration of the Alternative 4's ability to provide internet service, generate revenue to the City's General Fund, and LAPL's ongoing expansion and availability of online resources, similar to the Project, Alternative 4's increase in demand to any one local library would not be expected to result in a substantial increase in demand that would necessitate new or physically altered facilities. Therefore, similar to the Project, Alternative 4 would not create the need for new or physically altered library facilities, the construction of which would result in substantial adverse physical environmental impacts, in order to maintain acceptable service ratios or objectives. Therefore, as with the Project, impacts to libraries under Alternative 4 would be less than significant. However, because Alternative 4 would not result in a residential population gain, impacts with respect to libraries would be less than the Project.

(k) Transportation

During operation, the Project and the Project with the East Site Hotel Option would have different overall VMT and VMT per capita statistics. However, both development scenarios would result in the same transportation-related impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of Alternative 4 apply to both the Project and the Project with the East Site Hotel Option.

(i) Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities

Alternative 4, as with the Project, would support multimodal transportation options and a reduction in VMT, as well as promote transportation-related safety in the Project area. Alternative 4, as with the Project, would not conflict with policies of Mobility Plan 2035 and the City of Los Angeles Complete Streets Design Guide, adopted to protect the environment and reduce VMT. Similar to the Project, Alternative 4 would also be consistent with applicable transportation goals of the Hollywood Community Plan and the Hollywood Redevelopment Plan. Project Design Feature TRAF-PDF-1 under Alternative 4, as well as the Project, would implement a TDM Program to address parking, transit, commute trip reductions, shared mobility, bicycle use, and pedestrian access, and TDM management strategies. TDM measures to promote bicycle use include bicycle parking spaces, bike lockers, and showers for residents, employees, and visitors. Alternative 4, as with the Project, would not conflict with VisionZero to reduce traffic-related deaths; with LAMC Section 12.37 regarding street standards; with LADOT MPP, Section 321, regarding driveway design standards, or with the 1988 Hollywood Community Plan's Objective 6 to coordinate land use densities and to promote the use of transit. Alternative 4, as with the Project, would increase population density in close proximity to the Metro Red Line Hollywood/Vine Station, other regional Metro bus lines, and the LADOT DASH lines. Alternative 4, as with the Project, would also provide for road and pedestrian improvements, including a paseo linking the West Site and East Site and new median improvements along Vine Street, which would enhance pedestrian safety. A signalized mid-block crosswalk is proposed across Argyle Avenue to help facilitate local pedestrian circulation and access by maintaining a path of east-west travel with the existing mid-block crosswalks across Ivar Avenue and Vine Street. Similar to the Project, Alternative 4 would not conflict with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, and, as such, impacts relative to plans and programs would be less than significant and similar to the Project.

(ii) Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)

As required under CEQA Guidelines Section 15064.3(b) and based on proposed land uses, floor areas, TDM measures incorporated under Project Design Feature TRAF-PDF-1 (Transportation Demand Management Program), VMT standards would be applicable to Alternative 4, as well as the Project. Alternative 4 would have a work VMT of 5.0 per employee (the household per capita fee would not be

applicable).[50] The Project would have a household per capita VMT of 4.8 and is exempt from retail VMT. The Project with the East Site Hotel Option would have a work VMT of 4.8 and a household VMT of 4.7 per capita. These rates are all below the thresholds of significance proposed for the City's Central APC household per capita of 6.0 and work VMT of 7.6. per employee. Thus, similar to the Project, impacts under Alternative 4 would be less than significant. While the comparative worker VMT are below the APC thresholds, Alternative 4's work VMT per capita is higher than the Project's and as such, impacts with respect to CEQA Guidelines Section 15064(b) are considered to be greater than the Project.

(iii) Design Hazards

Alternative 4, as with the Project, would reduce existing curb cuts and provide new sidewalks around the perimeter of the Project Site. As with the Project, improvements under Alternative 4 would include a signalized mid-block crosswalk provided across Argyle Avenue to help facilitate local pedestrian circulation and access. As with the Project, Alternative 4 would provide a paseo through the Project Site between Argyle Avenue and Ivar Avenue. Alternative 4, as with the Project, would eliminate driveway crossings on Vine Street. Access to the Capitol Records Complex (including both the Capitol Records Building and the Gogerty Building) would continue to be provided via the existing driveway on Yucca Street. Similar to the Project, total existing curb cuts would be reduced from 12 total to a total of five. The driveways would not require the removal or relocation of existing passenger transit stops, and would be designed and configured to avoid potential conflicts with transit services and pedestrian traffic. Alternative 4, as with the Project, would not substantially increase hazards, vehicle/pedestrian conflict, or preclude City action to fulfill or implement projects associated with these networks. Similar to the Project, Alternative 4 would contribute to overall walkability through enhancements to the Project Site, streetscape, and crossing of Argyle Avenue, and would not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. Impacts under Alternative 4 would be less than significant and similar to the Project.

(iv) Emergency Access

The Project Site is located in an established urban area served by the surrounding roadway network, and multiple routes exist in the area for emergency vehicles and evacuation. Drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Similar to the Project, no policy or procedural changes to an existing risk management plan, emergency response plan, or evacuation plan would be required due to implementation under Alternative 4. All driveways and the internal circulation would be subject to LAFD review to confirm adequate access is provided internally for on-site emergency vehicle access. With review

50 Fehr and Peers, Alternatives Transportation Analysis, March 2020, Appendix R of this Draft EIR.

and approval of Project Site access and circulation plans by the LAFD, Alternative 4, as with the Project, would not impair implementation of or physically interfere with adopted emergency response or emergency evacuation plans. Impacts regarding emergency access under Alternative 4 would be less than significant and similar to the Project.

(l) Tribal Cultural Resources

As tribal cultural resources impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparison of impacts of Alternative 4 apply to both the Project and the Project with the East Site Hotel Option.

The City complied with AB 52 in its consultation and records searches conducted through SCCIC and the NAHC for the Archaeological and Paleontological Resources Assessment. The research indicated no known tribal cultural resources within the Project Site or surrounding area. However, as with the Project excavations associated with Alternative 4 could have a potential, albeit a low potential, to encounter previously unknown and buried tribal cultural resources. However, similar to the Project, in the event that buried tribal cultural resources are encountered during construction under Alternative 4, the Project Applicant will be required to comply with the City's standard Conditions of Approval for the treatment of inadvertent Tribal cultural resource discoveries. With compliance, Alternative 4, as with the Project, would result in less-than-significant impacts to tribal cultural resources. As excavation depths would be the same, impacts to tribal cultural resources under Alternative 4 would be similar to the Project.

(m) Utilities and Service Systems – Water, Wastewater, and Solid Waste

During operation, the Project and the Project with the East Site Hotel Option would have different utility demand statistics (i.e., water demand, wastewater generation, and solid waste generation). However, both development scenarios would result in the same impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of Alternative 4 apply to both the Project and the Project with the East Site Hotel Option.

(i) Wastewater

Alternative 4 would generate additional wastewater and increase demand on the existing Hyperion Treatment Conveyance System and Hyperion Treatment Plant. **Table V-7**, *Alternative 4 Wastewater Generation During Operation*, summarizes Alternative 4's approximate wastewater generation.

TABLE V-7
ALTERNATIVE 4 WASTEWATER GENERATION DURING OPERATION

Land Use	Units	Generation Rate (gpd/unit)[a]	Total Wastewater Generation (gpd)
Hotel	324 rooms	150/room	48,600
Office	603,060 sf	0.17/sf	102,520
Retail/Restaurant Lobbies	16,882 sf	50/1,000 sf	844
Restaurant: Full Service Indoor Seat[b]	1,232 seats	30/seat	36,960
Health Club/Spa	9,337 sf	650/1,000 sf	6,069
Swimming Pool/Spa[c]	8,100 cf	7.4805/cf	60,592
Cooling Towers	7,971 sf	170/1,000 sf	1,355
		Total	**256,940 gpd**

Acronyms: sf = square feet, gpd = gallons per day, cf = cubic feet

[a] The generation rates are based on the LASAN sewerage generation factors.

[b] To calculate the number of seats, 1 seat per 15 sf of dining area was assumed. To be conservative, the calculation assumes the Alternative's entire retail/restaurant floor area of 30,176 sf would be restaurant uses.

[c] Includes one large swimming pool.

SOURCE: ESA, 2020

As shown in Table V-7, Alternative 4 is estimated to generate approximately 256,940 gpd, or approximately 0.256 mgd.[51] In comparison, the Project is estimated to increase on-site wastewater generation by 311,680 gpd, or approximately 0.312 million mgd and the Project with the East Site Hotel Option is anticipated to generate 322,067 gpd, or approximately 0.322 mgd. These estimates do not account for reductions in wastewater generation that would occur with implementation of conservation measures. Similar to the Project, the increase in wastewater generation by Alternative 4 would be within the capacity limits of the conveyance and treatment facilities serving the Project Site. Similar to the Project, impacts on wastewater conveyance and treatment systems under Alternative 4 would be less than significant. However, because Alternative 4 would generate a lower volume of wastewater, impacts under Alternative 4 would be less than the Project.

(ii) Water Supply

Alternative 4 would increase demand on water supplies and infrastructure. Based on wastewater generation factors shown in Table V-7, commercial and recreational

51 As shown in Table V-7, the total amount of wastewater generation for the swimming pool is 60,592 gpd. This circumstance would occur only if the swimming pool were all drained on any given day. Daily wastewater generation for the swimming pool would typically be less than approximately 500 gallons per day. As such, this analysis is conservative in presenting the maximum wastewater generation scenario for the swimming pool.

uses provided under Alternative 4 would generate a maximum day water demand of 256,940 gpd, which includes water demand from draining the pools entirely. However, draining the pools would occur very infrequently and on average over the course of a year, pool–related water demand would average less than approximately 500 gallons per day. Thus, the water demand analysis below is based on this average pool daily water demand to provide a reasonable assessment of yearly water demand. Additional water would be required for landscaping and indoor parking structure space. As under the Project, Alternative 4's landscaping would require approximately 2,227 gpd and indoor parking space would require approximately 445 gpd of water. Alternative 4's maximum day water demand is estimated to be 259,612 gpd prior to water conservation measures. Water conservation measures under the City's Ordinance No. 184,248, the 2017 Los Angeles Plumbing Code, and the 2017 Los Angeles Green Building Code, and implementation of the Applicant's water conservation efforts and Project Design Feature WS-PDF-1 would result in a savings of approximately 39 percent (as assumed for the Project as well and excludes swimming pools). Assuming a water demand of 500 gallons per day for the swimming pool, Alternative 4's average daily water demand would be would typically be less than approximately 121,902 gpd (136 afy).[52]

In comparison, the Water Supply Assessment for the Hollywood Center Project indicated the Project and the Project with the East Site Hotel Option would have a water demand of 163,098 gpd (~183 afy) and 182,896 gpd (~205 afy), respectively, accounting for water conservations and compliance with applicable regulations.[53] Similar to the Project, Alternative 4's water demand projections would be within LADWP's 2015 UWMP's projected increases in Citywide water demands, while anticipating multi-dry year water conditions through the planning horizon of 2040.

Furthermore, similar to the Project, operation of Alternative 4 would require new connections from existing facilities. With regulatory compliance to the LAMC and coordination with LADWP, operation of Alternative 4, as with the Project, would not result in the relocation or construction of new or expanded water facilities, the construction or relocation of which would cause significant environmental effects. Similar to the Project, operational impacts on water infrastructure under Alternative 4 would be less than significant.

Based on the above, while Alternative 4 and the Project would result in less than significant water supply and infrastructure impacts, because Alternative 4 would

52 Alternative 4 Land Uses from Table V-7 excluding pools (196,348 gpd) + Landscaping (2,227 gpd) + Indoor Parking (445 gpd) = 199,020 gpd. Then, 61% X 199,020 gpd = 121,402 gpd. Then, 121,402 gpd + 500 gpd (pools) = 121,902 gpd.

53 LADWP, WSA for the Hollywood Center Project, December 11, 2018, pp. 11 and 12. Provided in Appendix P-2 of this Draft EIR.

result in less average daily water demand compared to the Project, impacts would be less under Alternative 4 than the Project.

(iii) Solid Waste

Alternative 4, as with the Project, would increase solid waste generation at the Project Site that would need to be landfilled. The construction of Alternative 4 would generate less construction waste than the Project due the approximately 38.6-percent reduction in total floor area (789,967 square feet under Alternative 4 compared to 1,287,150 square feet under the Project). The maximum construction waste under the Project would represent a small fraction of the available capacity of the County's Azusa Land Reclamation landfill or one of the inert debris engineered fill operations in Los Angeles County. As such, impacts associated with construction under the Project and Alternative 4 would be less than significant. However, because construction materials would be less under Alternative 4, it would have less impact with respect to construction waste than the Project.

During operation, Alternative 4's 3,086 employees would generate 32,495 pounds of solid waste per day (based on 10.53 pounds per day per employee) or approximately 5,930 tons per year. After implementation of the City's 65-percent diversion rate, Alternative 4 would generate approximately 2,075 tons per year or 5.68 tpd of solid waste. The Sunshine Canyon Landfill, the primary recipient of Class III solid waste from the City, has a maximum daily capacity of 12,100 tpd and a disposal rate of 6,765 tpd, indicating a residual daily capacity of 5,335 tpd. Alternative 4's addition of 6.65 tpd[54] landfill disposal rate would represent 0.12 percent of Sunshine Canyon's residual daily capacity, assuming diversion.

By comparison, the Project, which would have a higher disposal rate than the Project with the East Site Hotel Option, would generate approximately 2,639 tons of solid waste requiring landfill disposal per year and approximately 7.23 tons of solid waste per day. After implementation of the City's 65-percent diversion rate, the Project would generate approximately 923.65 tons of solid waste per year or 2.53 tons of solid waste per day, which would be 2.96 tpd landfill disposal rate.

Similar to the Project, Alternative 4's additional solid waste generation would be accommodated by the County's City-certified waste processing facilities. As with the Project, Alternative 4's 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. Similar to the Project, impacts with respect to solid waste under Alternative 4 would be less than significant. However, because Alternative 4 would increase solid waste compared to the Project, impacts under Alternative 4 would be greater than the Project.

54 Alternative 4's daily disposal in tons assumes that landfills operate six days per week; 52 weeks * 6 days = 312 days. Therefore, the daily disposal is calculated by 2,075 tons / 312 days = 6.65 tpd.

(n) Energy Conservation and Infrastructure

During operation, the Project and the Project with the East Site Hotel Option would have different energy consumption statistics. However, both development scenarios would result in the same impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of Alternative 4 apply to both the Project and the Project with the East Site Hotel Option.

(i) Efficient Energy Consumption

Alternative 4, as with the Project would incorporate energy-conservation measures beyond regulatory requirements as specified in Project Design Features GHG-PDF-1 and WS-PDF-1, as applicable to commercial uses. These require USGBC LEED Gold Certification energy performance optimization features such as reducing building energy cost by a minimum of 11.6 percent for new construction compared to the 2019 Title 24 Building Energy Efficiency Standards and installing energy efficient appliances. As with the Project, Alternative 4 would comply with and exceed existing minimum energy efficiency requirements such as the Title 24 standards and CALGreenCode, including for building rooftops to be solar-ready so that on-site solar photovoltaic or solar water heating systems could be installed in the future. Alternative 4, as with the Project, would be designed to exceed ASHRAE 90.1-2010 standards by more than 20 percent through the use of efficient heating, ventilation, and HVAC systems and a high-performance building envelope. Indoor air quality would be enhanced through the selection of low-VOC emitting materials, and exhaust systems would be utilized for optimal ventilation in both kitchens and bathrooms. Alternative 4, as with the Project, would meet the requirements of the Los Angeles Green Building Code and the CALGreen Code regarding on-site renewable energy sources.

Alternative 4, as with the Project, would be consistent with and not conflict with SCAG's land use type for the area and would encourage alternative transportation, and achieve a reduction in VMT resulting in a transportation efficiency level better than the Hollywood neighborhood and City and statewide average.

Based on energy consumption modeling for Alternative 4, natural gas usage in Alternative 4 would be approximately 2 percent less and approximately 12 percent less when compared to the Project and the Project with the East Site Hotel Option, respectively.[55] Electricity usage would be approximately 33 percent higher and approximately 27 percent higher when compared to the Project and the Project with the East Site Hotel Option, respectively. Despite the differences in energy consumption, Alternative 4, as with the Project, would not cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation, and, as such, impacts related to efficient energy consumption would be less than significant. As both would similarly comply to applicable efficient energy

55 Refer to Appendix R, Alternative Analyses, for CalEEMod operational energy demand worksheets for Alternative 4.

consumption regulations, impacts under Alternative 4 would be similar to the Project.

(ii) Conflict with Plans for Renewable Energy or Energy Efficiency

As with the Project, Alternative 4 would comply with existing energy standards, would include a project design and building operation that would incorporate energy-conservation measures beyond those otherwise required, and would not conflict with adopted energy conservation plans. Alternative 4, as with the Project, would be designed to meet the USGBC LEED Gold Certification including energy performance optimization features, such as reducing building energy demand by a minimum of 11.6 percent for new construction compared to the 2019 Title 24 Building Energy Efficiency Standards. Among other features it would install energy efficient appliances that meet the USEPA ENERGY STAR rating standards or equivalent; incorporate heat island reduction strategies, such as high-reflectance and vegetated roofs for the Project roof areas; provide water efficient fixtures and landscaping to reduce indoor water usage; and provide an HVAC system that would be sized and designed in compliance with the CALGreen Code to maximize energy efficiency caused by heat loss and heat gain. Alternative 4, as with the Project, would have the same automobile fuel efficiencies associated with access to alternative modes of transportation.

By exceeding the regulatory standards, similar to the Project, Alternative 4 would have a less-than-significant impact regarding the provisions of plans for renewable energy and energy efficiency. As Alternative 4 would be in compliance with plans for renewable energy and energy efficiency, impacts under Alternative 4 would be similar to the Project.

(iii) Relocation or Expansion of Energy Infrastructure

Alternative 4, as with the Project, would utilize energy infrastructure to accommodate their respective demand for energy resources. Similar to the Project, Alternative 4's electricity and natural gas demands are expected to represent a small fraction of LADWP and SoCalGas energy supplies and the service provider's existing infrastructure. As concluded in Section IV.O, *Energy Conservation and Infrastructure*, of this Draft EIR, planned electricity and natural gas supplies would be sufficient to meet the Project's demand for electricity and natural gas. As with the Project, Alternative 4 would not result in an increase in demand for electricity or natural gas services that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Similar to the Project, impacts with respect to the relocation or expansion of energy infrastructure under Alternative 4 would

be less than significant. As off-site energy infrastructure would accommodate Alternative 4, impacts would be similar to the Project.

(3) Relationship of the Alternative to Project Objectives

As described above, Alternative 4, the Office, Hotel and Commercial Alternative, would consist a hotel building and office building, each containing retail and restaurant uses at ground level. No residential uses would be provided. The buildings would rise to 12 and 22 stories, respectively. Alternative 4 would provide 30,176 square feet of retail/restaurant uses and incorporate 32,657 square feet of publicly accessible open space and a paseo running between Argyle Avenue and Ivar Avenue. Alternative 4 would represent an approximate 38.6 percent reduction in the Project's total floor area. Alternative 4 would also be constructed to meet LEED-Gold equivalent standards, would provide commercial uses and would provide publicly accessible open space. As such, it would be fully consistent with the following Project Objectives:

5. Promote local, regional, and State land use and mobility objectives and reduce vehicle miles traveled (VMT) by maximizing infill development within an existing Regional Center near jobs, retail, and entertainment in proximity to transit and transportation infrastructure that encourages pedestrian activity.

8. Support the growth of the City's economic base through the introduction of an economically viable project which creates a significant number of construction and permanent jobs.

10. Incorporate sustainable and green building design and construction to promote resource conservation, including waste reduction, efficient water management techniques, and conservation of energy to achieve a LEED-Gold equivalent building.

Although Alternative 4 would provide for an all commercial development, it would not activate the Hollywood area to the same extent as under the Project. Also, because Alternative 4 would not include a residential component, it would not meet the full intention of the Project to provide mixed-uses. Therefore, it would not meet the following objectives to the same extent as under the Project and is, thus, considered to be only partially consistent with the following objectives:

1. Redevelop the Project Site, with a mixed-use development that protects the architectural and historical heritage of the Capitol Records Complex and activates Hollywood Boulevard, Vine Street, and surrounding streets through connected, publicly available landscaped open space, including a paseo with shopping, seating, open air dining, and art installations, and plazas accommodating performances and community focused events.

2. Create a hub of activity surrounding the Capitol Records Complex and the intersection of Hollywood Boulevard and Vine Street, by activating the eastern

end of Hollywood Boulevard and the terminus of the Hollywood Walk of Fame, to increase engagement with the Capitol Records Complex.

3. Develop architecturally distinct buildings that are compatible with the Capitol Records Complex through a design that responds to the Capitol Records Building's modernist architectural character, and preserve views of the Capitol Records Building.

4. Maintain prominent views of the Capitol Records Building by providing building setbacks, visual buffers, open space between the Project's new buildings and the Capitol Records Complex, and safe public viewing areas from the proposed paseo and plazas, to maximize view corridors and continue showcasing its distinctive architectural design.

7. Cluster jobs and housing near transit by locating a high-density, mixed-use development within a Transit Priority Area.

9. Activate the Hollywood area with commercial opportunities that could serve local employees, generate local tax revenues, and provide new permanent jobs and housing for residents in support of local business.

Alternative 4 would not include residential units, including affordable senior housing, and, as such, would not be consistent with the following objectives:

6. Provide affordable senior housing with outdoor spaces in proximity to public transportation, allowing an age-specific demographic to continue to live in their residence of preference while maintaining access to services and goods.

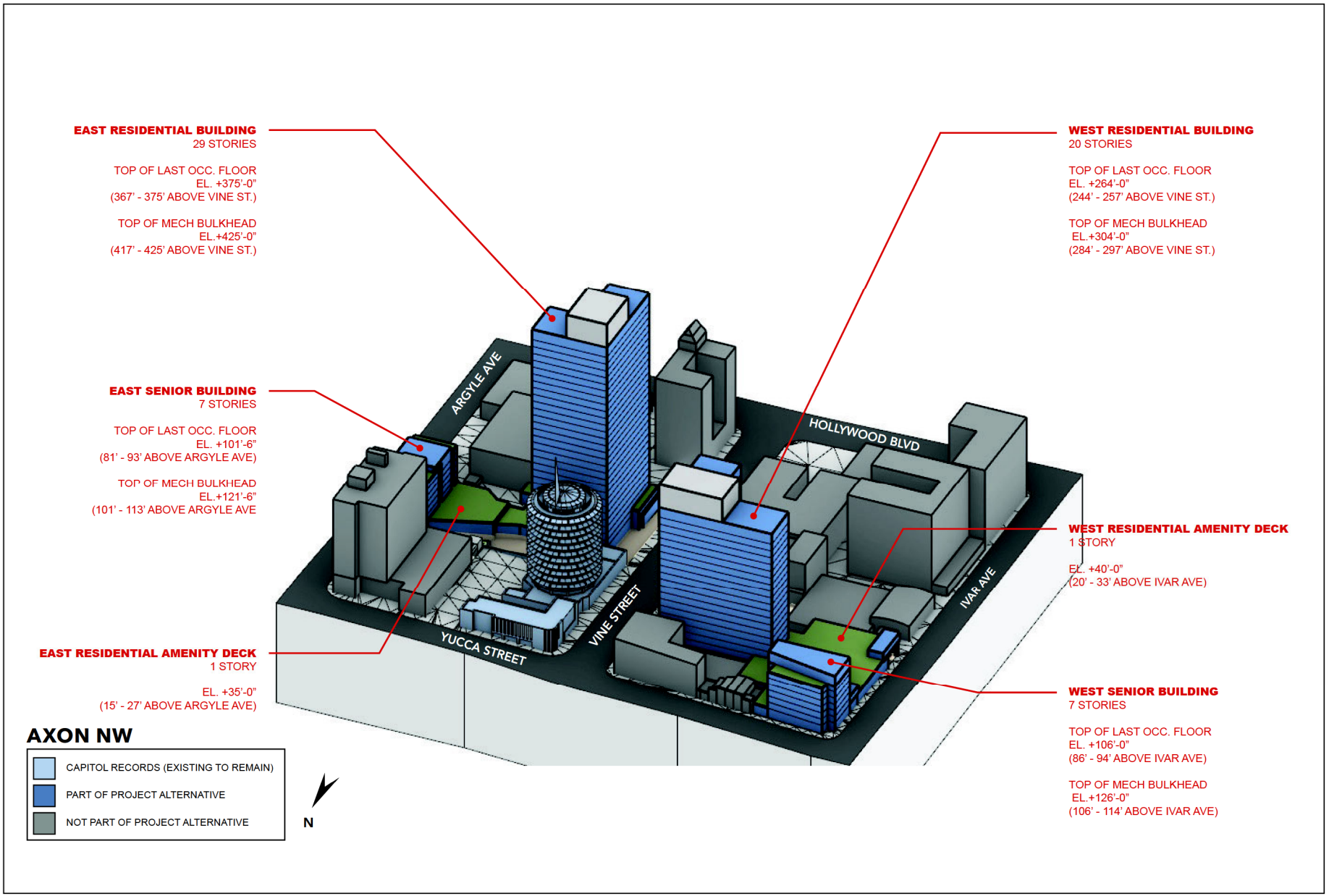
e) Alternative 5: Proposed Community Plan Update-Compliant Alternative

(1) Description of the Alternative

The Proposed Community Plan Update-Compliant Alternative (Alternative 5) would develop the Project Site in accordance with the proposed zoning designation for the Project Site in accordance with the Hollywood Community Plan Update (HCPU2). The Proposed HCPU2 would change the zoning of the Project Site from its existing C2-2D-SN zone to (Q)C4-2D-SN-CPIO. The Project Site would be designated as Subarea 4:3, in which residential uses shall only be permitted if a project incorporates a minimum 0.5:1 FAR of non-residential uses, and the total floor area of all buildings or structures on a lot shall not exceed an FAR of 4.5:1. A project may exceed the 4.5:1 FAR provided that it is approved by the City Planning Commission, or the City Council on appeal, pursuant to the procedures set forth in LAMC 12.32 D and that the project conforms with Hollywood Community Plan policies.

The CPIO designation (Community Plan Implementation Overlay) focuses on historic preservation and pedestrian-oriented design. The CPIO would have regulatory protections for designated historical resources, including prohibitions on obtaining a demolition permit for all buildings or structures that are 45 years or older. The CPIO also requires pedestrian-oriented design standards for commercially-zoned properties, which include ground-floor retail, window transparency, attractive street frontages, and building forms that enhance safety and walkability.

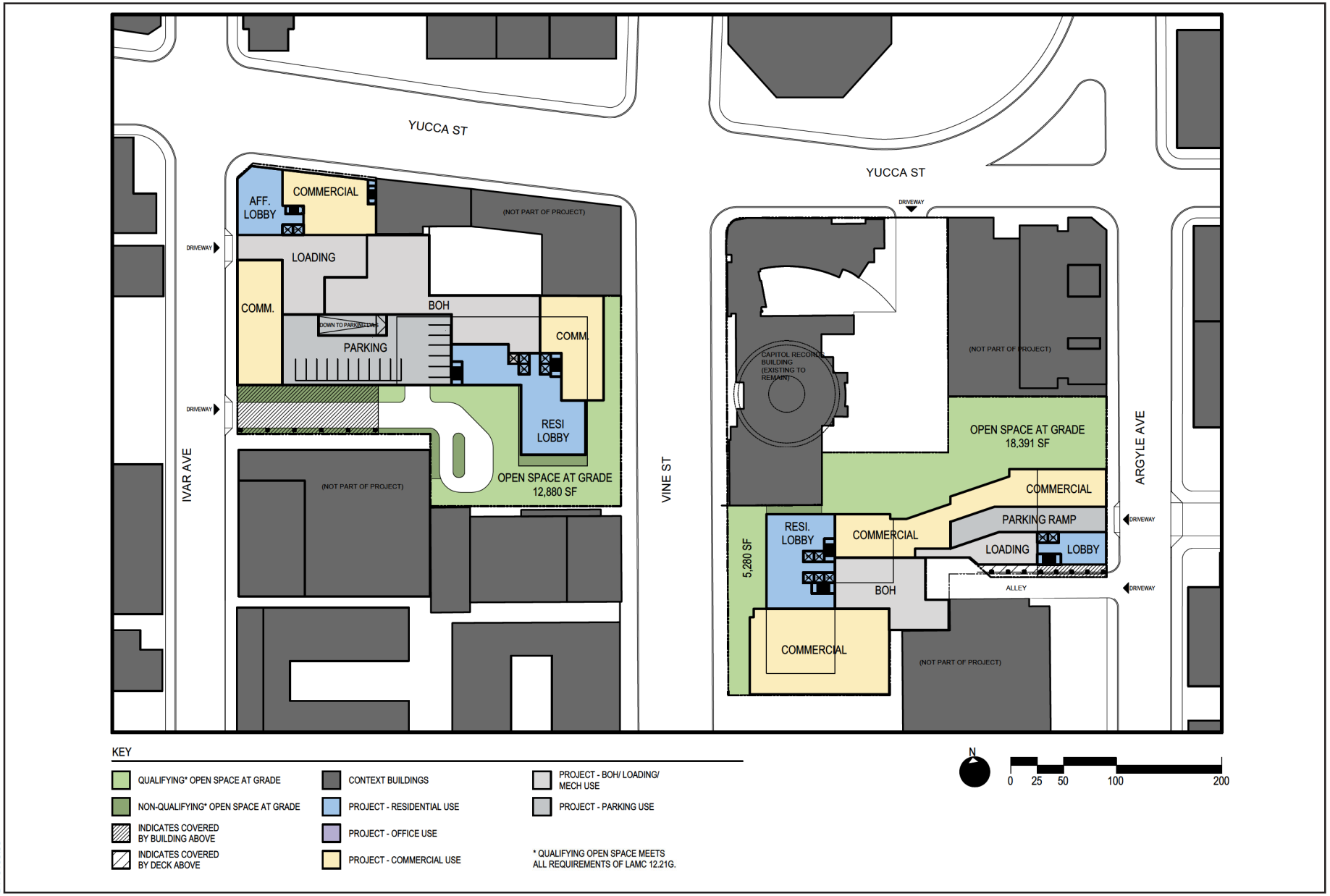
Alternative 5 would be developed with a floor area of 4.5:1 and incorporate retail and restaurant floor area, as under the Project. Approximately 17,485 square feet of retail and restaurant uses would be provided on the East Site, and approximately 12,691 square feet of retail and restaurant uses would be provided on the West Site, for a total of 30,176 square feet of retail and restaurant uses. Alternative 5 would provide both market-rate and senior affordable housing, as under the Project, but at a reduced rate compared to the Project to reflect an incremental reduction in floor area. Alternative 5 would provide 303 market-rate units and 46 senior affordable units on the East Site; and 280 market-rate units and 43 senior affordable units on the West Site, for a total of 583 market-rate units and 89 senior affordable units. As shown in **Figure V-10**, *Building Massing for Alternative 5*, Alternative 5's residential components would be provided within four buildings, two each on the East and West Sites. The East Building would reach a height of 375 feet at the top of the 29th story and 425 feet at the top of the bulkhead. The West Building would reach a height of 264 feet at the top of the 20th story and 304 feet at the top of the bulkhead. The East Senior Building, located along Argyle Avenue, would be seven stories and reach a maximum height of 101.5 feet at the top of the 7th story and 113 feet at the top of the bulkhead. The West Senior Building, which would be located in the northwestern corner of the Project Site would reach a height of 106 feet at the top of the 7th story and 126 feet at, the top of the bulkhead. Alternative 5 would be developed with a total of 36,551 square feet of publicly accessible open space at the ground level, which would form a paseo through the East Site and a plaza accessible from Vine Street on the West Site. No performance stage would be located within the paseo off of Vine Street on the East Site. The total new floor area for Alternative 5 would be approximately 789,921 square feet, which would represent an approximate 38.7-percent reduction in floor area compared to the Project. A four-level subterranean parking structure containing 438 spaces would be provided on the East Site; and a three-level subterranean parking structure containing 308 parking spaces would be provided on the West Site, for a total of 746 parking spaces. Vehicle and bicycle parking would be provided in accordance with LAMC requirements. **Figure V-11**, *Alternative 5 Ground Floor Plan*, illustrates the uses and open space at the ground level, and **Figure V-12**, *Alternative 5 Building Footprints*, illustrates the location of proposed residential buildings relative to the proposed ground level uses. The components of Alternative 5 are compared to those of the Project in **Table V-8**, *Comparison of Alternative 5 to the Project*, below.



SOURCE: Handel Architects, 2019

Hollywood Center Project

Figure V-10
Building Massing for Alternative 5



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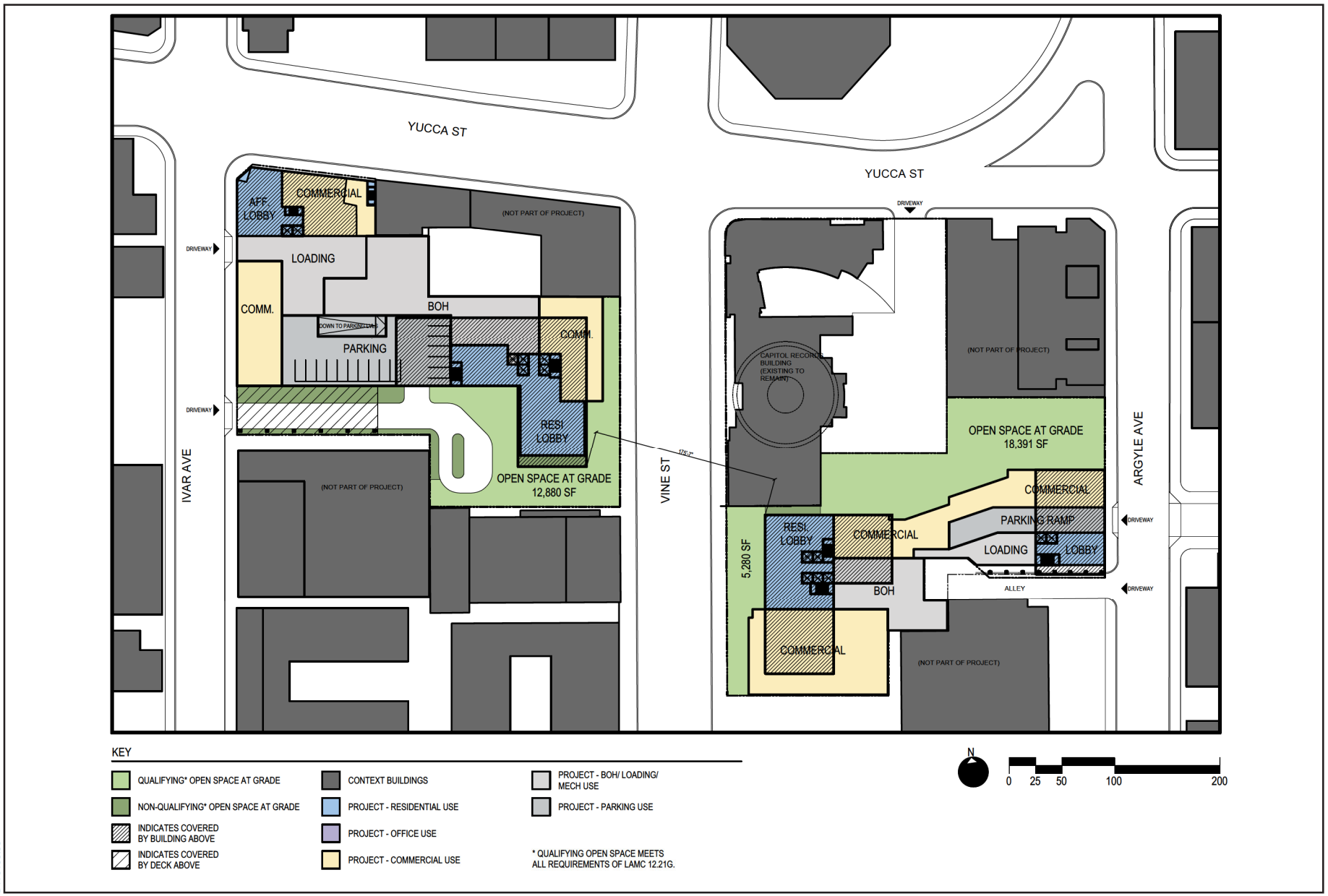
SOURCE: Handel Architects, 2020

Hollywood Center Project

Figure V-11
Alternative 5 Ground Floor Plan



D170105.00

SOURCE: Handel Architects, 2020

Hollywood Center Project

Figure V-12
Alternative 5 Building Footprints

TABLE V-8
COMPARISON OF ALTERNATIVE 5 TO THE PROJECT

Component	Project	Project With the East Site Hotel Option	Alternative 5
Publicly Accessible Open Space	33 832 sf	33,922 sf	36,551 sf
East Site	24,990	24,990 sf	23,671 sf
West Site	8,932 sf	8,932 sf	12,880 sf
Maximum Building Height			
East Site	46 stories, 595 feet	46 stories, 595 feet	29 stories, 425 feet
West Site	35 stories, 469 feet	35 stories, 469 feet	20 stories, 297 feet
Market-Rate Units Total	872 du	768 du	583 du
East Site	423 du	319 du	303 du
West Site	449 du	449 du	280 du
Senior Affordable Units Total	133 du	116 du	89 du
East Site	65 du	48 du	46 du
West Site	68 du	68 du	43 du
Maximum Building Height Senior Buildings			
East Site	11 stories, 149 feet	9 stories, 131 feet	7 stories, 121 feet
West Site	11 stories, 155 feet	11 stories, 155 feet	7 stories, 126 feet
Hotel	N/A	220 rooms	N/A
Retail and Restaurant Floor Area Total	30,176 sf	30,176 sf	30,176 sf
East Site	17,485 sf	17,485 sf	17,485 sf
West Site	12,691 sf	12,691 sf	12,691 sf
Total New Floor Area	1,287,150 sf	1,277,741 sf	789,921 sf
East Site	638,407 sf	623,997 sf	407,045 sf
West Site	648,793 sf	648,744 sf	382,877 sf
Vehicle Parking	1,521 spaces	1,521 spaces	746 spaces
East Site	684 spaces	684 spaces	438 spaces
West Site	837 spaces	837 spaces	308 spaces
FAR[a]	6.973:1	6.901:1	4.5:1

[a] The calculated FAR includes new floor area in addition to the floor area of the Capitol Records and Gogerty Buildings (114,303 sf).

SOURCE: ESA, 2020.

(2) Environmental Impacts

(a) Aesthetics

SB 743 (codified in PRC Section 21099(d)(1)) and ZI File No. 2452 provide that a mixed-use or employment center project in a designated TPA site and infill area is not required to evaluate physical aesthetic impacts pertaining to scenic vistas, scenic resources, and light and glare in an EIR. Although the Project and this Alternative meet these criteria, for disclosure purposes only, information based on City thresholds is provided relative to scenic vistas, scenic resources, and light and glare.

As aesthetics impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 5 apply to both the Project and the Project with the East Site Hotel Option.

(i) Scenic Vistas

Alternative 5 would involve the construction of four new residential buildings with incorporated retail and restaurant uses. The East Building would reach a height of 375 feet at the top of the 29rd story and 425 feet at the top of the bulkhead. The West Building would reach a height of 264 feet at the top of the 20th story and 304 feet at the top of the bulkhead. The East Senior Building would be seven stories and reach a maximum height of 101.5 feet at the 7th story and 122 feet at the top of the bulkhead. The West Senior Building would be 7 stories and reach a maximum height of 106 feet at the 7th story and 126 feet at the top of the bulkhead. Construction and operation of Alternative 5 would affect public views across the existing surface parking lots and views of scenic elements within the Project Site. As with the Project, a construction fence will be erected along the periphery of the Project Site, including Vine Street (required under Project Design Feature AES-PDF-1), which would temporarily block views of the “Hollywood Jazz: 1945-1972” mural. Construction activities would also require the temporary removal of a portion of the Hollywood Walk of Fame. However, construction would be temporary and would not have a permanent substantial adverse effect on views of these features. As with the Project, the West Building would block some passing views of the historic Knickerbocker sign from the Hollywood Freeway. However, similar to the Project, because of the continuous movement of traffic and availability of other freeway views to the sign, the effect on this freeway view is not considered a substantial adverse effect of Alternative 5.

There are no existing significant panoramic views across the Project Site of the historic Hollywood Sign from adjacent streets or other public areas. Public views of broader scenic resources, such as the mountains and the Hollywood Sign through other street corridors, would continue to be available and would not be affected by construction or operation of Alternative 5. As with the Project,

Alternative 5 would block some intermittent views of the historic Capitol Records Building from sections of Ivar Avenue, Hollywood Boulevard, and Argyle Avenue. During construction and operation of Alternative 5, as with the Project, the Capitol Records Building would continue to be visible from more prominent view locations, such as the Hollywood Hills and the intersection of Hollywood Boulevard and Vine Street, or other sections along local streets. As with the Project, Alternative 5 would provide viewing opportunities of the Capitol Records Building from a new public paseo through the East Site and a plaza accessible from Vine Street on the West Site. As with the Project, the East Site high-rise would be set back from Vine Street to allow views of the Capitol Records Building from the intersection of Hollywood Boulevard and Vine Street. As with the Project, Alternative 5 would not result in substantial adverse effects on scenic vistas. Therefore, when compared to the Project, the effects on scenic vistas under Alternative 4 would be similar to the Project.

(ii) Scenic Resources

Impacts to on-site scenic resources, such as the on-site Capitol Records Building, the "Hollywood Jazz: 1945-1972" mural, the adjacent Hollywood Walk of Fame, and existing street trees, under Alternative 5 would be the same as the Project. Similar to the Project, construction vehicles and other construction activity on or adjacent to the Vine Street sidewalk under Alternative 5 would potentially impact the Hollywood Walk of Fame. However, as with the Project, implementation of Mitigation Measure CUL-MM-1 would ensure protection and temporary removal of the bronze and terrazzo Hollywood Walk of Fame stars and reduce impacts to less-than-significant. As with the Project, Alternative 5 would replace removed street trees with similar species and plant additional trees within the Project Site's open space areas, including the paseo, in accordance with the requirements of the LAMC and the City's Urban Forestry Division's requirements (currently requiring street tree replacement on a 2:1 basis). Overall, similar to the Project, Alternative 5 would not substantially damage scenic resources. As with the Project, Alternative 5 would implement measures to ensure the Hollywood Walk of Fame is protected and that no physical changes to nearby scenic resources or historic buildings would occur. Therefore, when compared to the Project, the effects on scenic resources under Alternative 5 would be similar to the Project.

(iii) Regulations Governing Scenic Quality

CEQA Appendix G addresses whether a project in an urban area would conflict with regulations that govern scenic quality, such as those applicable to street trees, exterior lighting, signage, and compliance with applicable policies of the General Plan or Community Plan. As with the Project, Alternative 5 would replace street trees and provide exterior lighting in compliance with LAMC regulations and would comply with signage regulations set forth under the HSSUD. Alternative 5 would be subject to design review and approval by the City to ensure the Project is designed to be consistent relevant Regional Center-related policies in the HCPU2

governing scenic quality. Therefore, similar to the Project, Alternative 5 would not conflict with the LAMC, HSSUD, or the applicable Community Plan policies governing scenic quality. As with the Project, impacts under Alternative 5 would be less than significant. As Alternative 5 would also comply with regulations governing scenic quality, impacts under Alternative 5 would be similar to the Project.

(iv) Light and Glare

As with the Project, Alternative 5 would introduce new lighting, including temporary construction lighting, wayfinding lights, security lighting, landscape lighting, street-level commercial signs, paseo lighting, architectural accent lighting, and interior lighting visible through windows, all of which would be installed pursuant to LAMC lighting requirements. Architectural lighting would be provided at the top of the new buildings, as under the Project. In combination with the Capitol Records Building, any architectural lighting and signage would be consistent with HSSUD policy encouraging illuminated signage to reflect a modern, vibrant image of Hollywood. However, as with the Project, no still or moving images would be projected onto the buildings. Project Design Feature AES-PDF-3 would ensure that glass used in building façades will be anti-reflective or treated with an anti-reflective coating in order to minimize glare. Project Design Feature AES-PDF-4 would require that construction and operational lighting be shielded and directed downward (or on the specific on-site feature to be lit) in such a manner so as to avoid undue glare or light trespass onto adjacent uses. Similar to the Project, the incorporation of Project Design Features and LAMC requirements in Alternative 5 would ensure that potential light and glare would not adversely affect day or nighttime views. However, Alternative 5 would result in smaller buildings and reduced scale of lighting compared to the Project, and, as such, light and glare effects would be less than the Project.

(b) Air Quality

Daily air quality construction emissions would be similar under the Project and the Project with the East Site Hotel Option. While the Project and the Project with the East Site Hotel Option would have nominally different daily operational emissions, the impact conclusions, significance levels, and mitigation measures are the same for the Project and the Project with the East Site Hotel Option. Accordingly, the below comparisons of impacts of Alternative 5 apply to both the Project and the Project with the East Site Hotel Option.

(i) Conflict with an Air Quality Management Plan

Similar to the Project, Alternative 5 would include new development on the Project Site that would generate new criteria pollutant emissions. Similar to the Project, Alternative 5 would be consistent with the goals of SCAG's 2016-2040 RTP/SCS and growth projections in the 2016 AQMP, since the growth would occur in a HQTA and a TPA. As with the Project, Alternative 5 would be consistent with the AQMP

in its incorporation of appropriate control strategies for emissions reduction during construction and operation. In addition, Alternative 5 would also be consistent with applicable goals, objectives, and policies of the Air Quality Element of the General Plan that support and encourage pedestrian activity in the Hollywood area and uses that contribute to a land use pattern addressing housing needs while reducing vehicle trips and air pollutant emissions within a TPA. For all of these reasons, impacts under Alternative 5 with respect to consistency with air quality management plans would be less than significant and similar to the Project.

(ii) Cumulative Increase in Criteria Pollutants/Violation of Air Quality Standards

(a) Construction

As with the Project, Alternative 5's construction phases have the potential to generate emissions that would exceed SCAQMD air quality standards through the use of heavy-duty construction equipment, construction traffic, fugitive dust emissions, paving operation, and the application of architectural coatings and other building materials. The maximum emissions under Alternative 5 would be similar to the Project because emission levels are based on a single day in which maximum construction activity would occur. Similar to the Project, with incorporation of Mitigation Measure AQ-MM-1 which would require the use of diesel-powered construction equipment that meet USEPA Tier 4 Final off-road emissions standards; use of pole electricity or alternative energy to power electric tools, equipment, and lighting; maintenance and operation of construction equipment to minimize exhaust emissions; and incorporation of Project Design Feature GHG-PDF-1 (Green Building Features), construction emissions under Alternative 5 would not exceed SCAQMD numerical significance thresholds. Similar to the Project, because Alternative 5's construction emission levels would be below the applicable numerical significance thresholds, emissions related to air quality standards would be less than significant. Alternative 5, which would include a total of 789,921 square feet of floor area, would reduce the Project's scale of development by approximately 497,229 square feet (an approximately 38-percent reduction) and, thus, would reduce overall construction duration. As Alternative 5 would reduce construction duration, impacts with respect to cumulative increases in criteria pollutants and violations of air quality standards would be less than the Project.

(b) Operation

During operation, Alternative 5 would generate emissions associated with vehicle trips, heating, lighting, other electric and natural gas power requirements, emergency generators, and architectural coatings. Similar to the Project, Alternative 5 would incorporate Project Design Feature GHG-PDF-1 (Green Building Features) and would comply with SCAQMD Rule 1113 regarding architectural coatings.

NOx emissions would be 76 and 79 pounds per day for the Project and the Project with the East Site Hotel Option, respectively. The daily impact threshold for NOx is 55 pounds per day. Despite the reduction in land use intensity and traffic under Alternative 5, daily operational NOx emission exceedances would occur under Alternative 5 as it would require a sizeable generator, and its collective NOx generating sources are expected to be above 55 pounds per day. Alternative 5 would implement the same Mitigation Measure AQ-MM-2 as the Project to reduce operational NOx levels to a less-than-significant level.

As Alternative 5 would be less intense and have less traffic than the Project, its operational daily emissions would not exceed the SCAQMD numerical significance thresholds for VOC, CO, SOx, PM10 and PM2.5. Thus, as with the Project, impacts would be less than significant under Alternative 5 for these criteria pollutants. However, because of its reduced emissions, impacts under Alternative 5 with respect to cumulative increases in criteria pollutants and violations of air quality standards would be less than Project.

(iii) Exposure of Sensitive Receptors to Pollutant Concentrations

(a) Localized Emissions

As with the Project, Alternative 5 would generate construction activity and traffic, and increase localized emission levels. It can be expected that maximum daily localized construction emissions would be similar to the Project. However, because of its smaller scale and intensity, localized operational emissions under Alternative 5 would be less than the Project. As with the Project, maximum localized emissions associated with grading and architectural coatings during construction and charbroilers, landscaping, coatings, and use of consumer products, and other sources at sensitive receptors would be below the localized screening thresholds for NO_X, CO, PM10, and PM2.5, including at the nearest receptors adjacent to the Project Site. Therefore, similar to the Project, with respect to localized construction and operation emissions, impacts to sensitive receptors would be less than significant under Alternative 5. Alternative 5 would reduce the scale of the Project, the duration of construction, and building floor area compared to the Project. The reduction in construction would reduce the duration of localized emissions during construction. The reduction in building floor area and reduced occupancy of the Project Site under Alternative 5 would reduce daily operational localized emissions from less building energy demand, consumer product usage, and architectural coatings usage. Accordingly, impacts under Alternative 5 with respect to localized emissions would be less than under the Project.

(b) Carbon Monoxide Hotspots

Vehicle trips would be less under Alternative 5 than the Project. As such, as with the Project, Alternative 5 would not cause or contribute considerably to the

formation of CO hotspots, and impacts would be less than significant. However, because Alternative 5 would reduce the Project's daily vehicle trips, impacts would be less than the Project

(c) Toxic Air Contaminants

(i) Construction

Under Alternative 5, as with the Project, temporary TAC emissions associated with DPM emissions from heavy construction equipment would occur during construction activities. Mitigation Measure AQ-MM-1 would require utilization of off-road diesel-powered construction equipment that meets or exceeds the most stringent and environmentally protective CARB and USEPA Tier 4 off-road emissions standards. The Tier 4 standards would reduce DPM emissions by approximately 81 to 96 percent compared to equipment that meet the Tier 2 off-road emissions standards. As with the Project, with implementation of the required mitigation, Alternative 5 would not expose sensitive receptors to substantial TAC concentrations, and impacts would be less than significant. However, because Alternative 5 would reduce the scale and duration of construction activities, impacts under Alternative 5 would be less than the Project.

(ii) Operation

Alternative 5, as with the Project, would use consumer products and architectural coatings or involve other sources, such as charbroiling associated with restaurant uses. TAC emissions from these sources are anticipated to be minimal and all restaurant emissions would be regulated under SCAQMD Rule 1138. In addition, Alternative 5 would provide stationary emergency generators in the residential buildings. The emergency generators would result in emissions during maintenance and testing operations. Emergency generators are permitted by the SCAQMD and regulated under SCAQMD Rule 1470. Maintenance and testing would occur periodically, up to 50 hours per year per Rule 1470. As with the Project, Alternative 5's land uses would not include installation of industrial-sized paint booths or require extensive use of commercial or household cleaning products. Alternative 5 would generate only minor amounts of diesel emissions from mobile sources (non-on-site construction vehicles), such as delivery trucks that would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. Furthermore, trucks would be required to comply with the applicable provisions of the CARB 13 CCR, Section 2025 (Truck and Bus regulation) to minimize and reduce PM and NO_X emissions from existing diesel trucks. As a result, toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the uses expected on the Project Site, as with the Project, potential long-term operational impacts associated with the release of TACs under Alternative 5 would be minimal, regulated, and controlled, and would not be expected to exceed the applicable SCAQMD numerical significance

thresholds. Operation of Alternative 5, as with the Project, would not expose sensitive receptors to substantial TAC concentrations, and operational impacts would be less than significant. However, because of Alternative 5's reduced overall scale of development and reduction in use of consumer products and other sources, such as architectural coatings, impacts under Alternative 5 would be less than the Project.

(d) Other Emissions Affecting a Substantial Number of People

Activities under Alternative 5 would potentially generate other emissions, such as those leading to odors. These may include the use of architectural coatings and solvents, as well as the combustion of diesel fuel in on-and off-road equipment. SCAQMD Rule 1113 would limit the amount of VOCs in architectural coatings and solvents. In addition, Alternative 5 would comply with the applicable provisions of the CARB Air Toxics Control Measure regarding idling limitations for diesel trucks. Through mandatory compliance with SCAQMD rules, construction activities and materials are not expected to result in emissions that would create objectionable odors affecting a substantial number of people. Operation of Alternative 5 would not involve land uses typically associated with odor complaints, such as agricultural uses or food processing plants, or any uses identified by the SCAQMD as being associated with substantial odors. As with the Project, Alternative 5 is not expected to discharge contaminants into the air in quantities that would cause a nuisance, injury, or annoyance to the public or property pursuant to SCAQMD Rule 402. Therefore, as with the Project, odor and other emissions impacts under Alternative 5 would be less than significant. Accordingly, impacts with respect to other emissions under Alternative 5 would be similar to the Project.

(c) Cultural Resources

As cultural resources impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 5 apply to both the Project and the Project with the East Site Hotel Option.

(i) Historical Resources

As with the Project, Alternative 5 would not demolish or cause an adverse material change in the eligibility of any historical resources within the Project Site due to direct impacts. Building heights under Alternative 5 (29 stories on the East Site and 20 stories on the West Site) would be lower than the Project and, thus, more consistent with Hollywood's existing built environment than the Project, which would result in 46- and 35-story buildings on the East Site and West Site, respectively. Compared to the Project, Alternative 5 would have less effect related to contrasting building heights, although potential indirect impacts associated with this contrast under the Project would be less than significant. Therefore, as with the Project, indirect impacts associated with contrasting building heights would be

less than significant under Alternative 5; however, impacts would be incrementally less under Alternative 5 than the Project because of the reduction in building heights.

As with the Project, Alternative 5 would also result in temporary alterations to the Hollywood Walk of Fame and potentially significant and unavoidable impacts due to structural vibration at nearby historical resources during construction. As with the Project, impacts associated with Alternative 5 could be reduced to less-than-significant with implementation of Mitigation Measures CUL-MM-1, CUL-MM-2, and NOI-MM-4. As with the Project, the mitigation available for Alternative 5 would avoid significant impacts on the Capitol Records Building and Gogerty Building and would provide similar protections to the other proximate historical buildings subject to potential structural damage from vibration, as follows: the Pantages Theatre, Avalon Hollywood, and the building located at 6316-24 Yucca Street/Art Deco Storefront. However, because Mitigation Measure CUL-MM-2 and Mitigation Measure NOI-MM-4 require the consent of other property owners, who may not agree to participate in their implementation, it is conservatively concluded that structural vibration and settlement impacts on proximate historical resources would remain significant and unavoidable after implementation of mitigation measures. Nonetheless, because Alternative 5 would reduce the extent and duration of the Project's construction, vibration impacts under Alternative 5 would be less than the Project, and, thus, impacts to historical resources under Alternative 5 would be less than the Project.

(ii) Archaeological Resources

Excavation associated with Alternative 5 would reach depths of to 44 feet on the East Site and 33 feet on the West Site, compared to up to 64 feet deep (subterranean garage depth only) under the Project. Similar to the Project, these excavations would cut into the historic fill layer, as well as previously undisturbed native soils. Such depths have the potential to encounter prehistoric and/or historic archaeological resources. Alternative 5, as with the Project, would implement Mitigation Measures CUL-MM-3 through CUL-MM-5. With the implementation of these measures, Alternative 5, as with the Project, would provide for appropriate treatment and/or preservation of resources if encountered. Under Alternative 5, as with the Project, potentially significant impacts to archaeological resources would be mitigated to a less-than-significant level. However, because Alternative 5 would involve less excavation, impacts related to archaeological resources under Alternative 5 would be less than the Project.

(iii) Human Remains

As with the Project, excavation associated with Alternative 5 would reach depths of 44 feet on the East Site and 33 feet on the Wet Site, compared to up to 64 feet deep (subterranean garage depth only) under the Project. Pursuant to California Health and Safety Code Section 7050.5, Public Resources Code 5097.98, and

California Code of Regulations Section 15604.5(e), any discovery of unrecorded human remains would require the immediate halting of construction or ground-disturbing activities and notification of the County Coroner. If the remains are determined to be Native American in origin, a "Most Likely Descendent" would be contacted to assist in determining appropriate treatment for the remains. In the event of the discovery of unrecorded human remains during construction, compliance with applicable regulatory requirements would ensure potential impacts are less than significant. Thus, Alternative 5, as with the Project, would have a less-than-significant impact with respect to human remains. Therefore, impacts with respect to human remains under Alternative 5 would be similar to the Project.

(d) Geology and Soils

As geology and soils impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 5 apply to both the Project and the Project with the East Site Hotel Option.

(i) Seismic Hazards

The Project Site is located within the designated Alquist-Priolo Earthquake Fault Zone for the Hollywood Fault; however, underlying soil horizons indicate the Project Site has not experienced fault movement for at least 120,000 years and active faulting does not occur beneath the Project Site. Similar to the Project, excavation for Alternative 5's subterranean parking would remove the loose sand deposit and require suitable engineered stabilization in accordance with applicable City and CBC building regulations. The Project Site is not located within a designated landslide area, and the potential for landslide and seismically induced slope instability at the Project Site is considered to be low. As with the Project, Alternative 5's application of appropriate engineering controls and compliance with regulations for planned excavation and construction would minimize any potential site stability geologic hazards at the Project Site. Therefore, development of Alternative 5, as with the Project, would not result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury caused in whole or in part by exacerbation of existing environmental conditions. As with the Project, impacts related to geologic conditions under Alternative 5 would be less than significant through proper engineering methods and compliance with City and CBC building regulations. With implementation of building regulations and recommendations of applicable final geotechnical reports, impacts with respect to seismic hazards under Alternative 5 would be similar to the Project.

(ii) Soil Erosion or Loss of Topsoil

As with the Project, excavation associated with Alternative 5 would reach depths of approximately 44 feet on the East Site and 33 feet on the West Site, whereas

excavation associated with Project would reach depths of approximately 64 feet below the existing ground surface on the East and West Sites. Similar to the Project, construction of Alternative 5 would increase soil exposure and risk of soil erosion. The potential for water erosion Alternative 5 would be reduced by the implementation of standard erosion control measures during site preparation and grading activities. Construction activities would be carried out in accordance with applicable City standard erosion control practices required pursuant to the CBC and the requirements of the NPDES Construction General Permit issued by the LARWQCB, as applicable. In accordance with these requirements, a SWPPP would be prepared that incorporates BMPs to control water erosion during the construction period. Following construction, the Project Site would be covered completely by paving, structures, and landscaping, which would not leave any exposed areas of bare soil susceptible to erosion. Thus, similar to the Project, impacts due to erosion of topsoil would be less than significant under Alternative 5. Alternative 5, like the Project, would comply with CBC building regulations and implement a SWPPP and BMPs and, as with the Project, would result in less than significant soil erosion impacts. Based on the above, impacts under Alternative 5 would be similar to the Project.

(iii) Unstable Geologic Units

Alternative 5, as with the Project, would include sloped excavations properly shored in accordance with the applicable provisions of the CBC to minimize the potential for site stability hazards during temporary excavation activities. As with the Project, Alternative 5 would not be located on an unstable geologic unit. In addition, Alternative 5 would comply with CBC requirements and, prior to issuance of a grading permit, a qualified geotechnical engineer must prepare and submit to the LADBS a Final Geotechnical Report that includes site-specific design recommendations for seismic safety and design requirements for foundations, retaining walls/shoring and excavation to meet applicable State and City code and regulations. As with the Project, through adherence to the CBC and the recommendations of the Final Geotechnical Report, impacts with respect to geologic units under Alternative 5 would be less than significant and similar to the Project.

(iv) Expansive Soils

Similar to the Project, Alternative 5 would encounter and remove near surface soils that have a low to medium potential for expansion during excavation activities. In addition, expansive soil hazards would be further evaluated for the Project Site as part of the LADBS approved Final Geotechnical Report that would include site-specific design recommendations for addressing expansive soils, as needed. Further, as with the Project, compliance with standard construction and engineering practices, and proper engineering erosion control and drainage design would ensure that hazards associated with potential expansive soils or corrosive soils are properly addressed. As such, as with the Project, impacts related to

expansive soils or corrosive soils under Alternative 5 would be less than significant and similar to the Project.

(v) Paleontological Resources

As with the Project, Alternative 5 would require excavations for subterranean parking extending to 44 feet on the East Site and 33 feet on the West Site. By comparison, the Project would require excavations for parking to a depth of 64 feet. As such, Alternative 5, as with the Project, could access high sensitivity alluvial sediments. This classification indicates a high potential for fossils to be present in the subsurface. Similar to the Project, implementation of Mitigation Measures GEO-MM-1 through GEO-MM-3 under Alternative 5 would provide for appropriate treatment and/or preservation of resources and would mitigate impacts to paleontological resources to less-than-significant. However, because excavation depths would be less under Alternative 5, impacts related to paleontological resources would be less than the Project.

(e) Greenhouse Gas Emissions

Despite the Project and the Project with the East Site Hotel Option having slightly different overall GHG emissions, because impact conclusions and significance levels related to GHG emissions would be the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 5 apply to both the Project and the Project with the East Site Hotel Option.

The construction and occupancy of the Project Site under Alternative 5, as with the Project, would increase GHG emissions. As with the Project, Alternative 5 would incorporate GHG reduction characteristics, features, and measures. Although the State and City have not established quantitative values for GHG emissions, in order to comply with policies and regulations adopted for the purpose of reducing or mitigating GHG emissions, Alternative 5, as with the Project, would incorporate AQ-PDF-1, AQ-PDF-2 and GHG-PDF-1. The smaller scale and lower mobile emissions associated with Alternative 5 would generate lower GHG emissions than the Project's maximum GHG operational emissions. With incorporation of applicable Project Design Features, GHG emission impacts under Alternative 5, as with the Project, would be less than significant. Due to its lower GHG emissions, impacts under Alternative 5 with respect to GHG emissions on the environment would be less than the Project.

Alternative 5, as with the Project, with incorporation of AQ-PDF-1, AQ-PDF-2 and GHG-PDF-1, would be consistent with applicable strategies outlined in CARB's Climate Change Scoping Plan, SCAG's 2016-2040 RTP/SCS, Sustainable City pLAn, and the City's Green Building Code. As such, similar to the Project, impacts related to conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs would be less than significant under

Alternative 5. As discussed under the Transportation subsection, below, Alternative 5 would result in a household per capita VMT of 4.7 and is exempt from a retail VMT per capita finding, while the Project would result in a 4.8 household VMT is exempt from a retail VMT per capita finding. The Project with the East Site Hotel Option would result in a 4.7 household per capita VMT and 4.8 work VMT per employee. As such, because Alternative 5 would result in a similar VMT rate to the Project and would not conflict with applicable GHG plans, similar to the Project, impacts under Alternative 5 with respect to conflicts with GHG plans adopted for the purpose of reducing the emissions of GHGs would be less than significant and similar to the Project.

(f) Hazards and Hazardous Materials

As impacts related to hazards and hazardous materials would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 5 apply to both the Project and the Project with the East Site Hotel Option.

(i) Hazards to the Public or Environment through the Routine Transport, Use, or Disposal of Hazardous Materials

Construction of Alternative 5, as with the Project, would include demolition of existing parking surfaces and structures other than the Capitol Records Complex. Construction equipment and materials, such as fuels, oils and lubricants, solvents and cleaners, adhesives, paints and thinners, degreasers, cement and concrete, and asphalt mixtures, which are all commonly used in construction, would be used, stored, and disposed of in consumer quantities and in accordance with applicable laws and regulations and manufacturers' instructions. As with the Project, operation of Alternative 5 would involve the limited use of potentially hazardous materials typical of those used in residences, offices, hotels and restaurants, including cleaning agents, paints, pesticides, and other materials used for landscaping. In addition, hazardous materials on the Project Site would continue to be acquired, handled, used, stored, and disposed of in accordance with all manufacturers' specifications and all applicable federal, State, and local requirements. Compliance with all applicable regulations concerning the transport, use, and disposal of hazardous waste under Alternative 5, as with the Project, would reduce hazardous materials impacts to a less-than-significant level. While Alternative 5 and the Project would comply with the same regulations, because Alternative 5 would reduce the scale of the Project's construction and operation activity, impacts would be less than the Project.

(ii) Hazard to the Public or Environment Involving the Accidental Release of Hazardous Materials into the Environment

Alternative 5 would require excavation of soil for up to three and four levels of subterranean parking. Such excavation could expose the public or the environment to contaminated soils and soil vapors, and could reveal remnant steel structures and/or possibly USTs associated with historic automobile gas and service stations. As with the Project, under Alternative 5, Mitigation Measure HAZ-MM-1 (Soil Management Plan), would be implemented and would establish policy and requirements for the disposal of contaminated soils and management of soil vapors or other gases during excavation activities. Therefore, impacts related to the accidental release of hazardous materials during construction would be less than significant after mitigation and similar to the Project.

(iii) Hazard Resulting from Hazardous or Acutely Hazardous Materials, Substances, or Waste within One-Quarter Mile of a School

Alternative 5, as with the Project, is not located within one-quarter mile of a school. Similar to the Project, Alternative 5 would implement Mitigation Measure HAZ-MM-1 (Soil Management Plan), which would establish policy and requirements during construction for the disposal of contaminated soils and management of soil vapors or other gases during excavation activities. Also, similar to the Project, Mitigation Measure AQ-MM-1 would be implemented under Alternative 5 requiring the use of Tier IV construction equipment to minimize TAC emissions. In addition, during operation Alternative 5 would not require the handling of acutely hazardous materials or result in the emission of hazardous materials other than, potentially, VOCs. associated with diesel vehicles and consumer products (e.g., architectural coatings, household cleaners, landscaping fertilizers and pesticides, etc.). Alternative 5, as with the Project, during operation would only require the limited use of potentially hazardous materials associated with domestic maintenance and landscaping. In addition, Alternative 5 would comply with applicable local, State, and Federal laws and regulations relating to the use of hazardous or acutely hazardous materials. Therefore, as with the Project, impacts related to the use of hazardous or acutely hazardous materials within a quarter mile of a school under Alternative 5 would be less than significant, and similar to the Project.

(iv) Hazardous Materials Sites

Alternative 5, similar to the Project, would not involve construction or alter existing activities on a hazardous materials site compiled pursuant to Government Code Section 65962.5. Accordingly, Alternative 5 and the Project would have no impact with regard to development occurring on a hazardous materials site. Thus, impacts related to development on a hazardous materials site under Alternative 5 would be similar to the Project.

(v) Emergency Response Plan/Emergency Evacuation Plan

Alternative 5, as with the Project, would involve new construction and increased traffic. Alternative 5, as with the Project, would not however, affect the City's Emergency Operations Plan or established disaster evacuation routes, the nearest of which are Santa Monica Boulevard approximately 0.8 miles to the south and Highland Avenue approximately 0.6 miles to the west. As with the Project, Alternative 5 would not require any policy or procedural changes to the City of Los Angeles Emergency Operations Plan or the City's established disaster routes. Also, during an unanticipated disaster event, the LAPD and LAFD would implement operational protocols, as well as plans and programs, on a case-by-case basis, to facilitate emergency evacuations and/or response, which would consider traffic conditions at the time of the emergency. In such instances, traffic would be routed along the City's numerous disaster routes, as determined appropriate by the responding City agencies. Similar to the Project, construction and operation of Alternative 5 would not close any existing streets or otherwise represent a significant impediment to emergency response or evacuation of the local area. Construction of Alternative 5, as with the Project, would occur within the boundaries of the Project Site and within the rights-of-way of adjacent streets, including the median within Vine Street and signal installation along Argyle Avenue. Temporary partial lane closures are not anticipated to significantly affect the circulation of emergency vehicles, which normally have a variety of options for dealing with traffic and congestion, such as sirens, priority use of the roadway, and use of alternate routing. In addition, Alternative 5, as with the Project, would implement Project Design Feature TRAF-PDF-2, which requires preparation of a Construction Traffic Management Plan and includes street closure information, a detour plan, haul routes, and a staging plan. The Construction Traffic Management Plan will be submitted to the City for review and approval. With Project Design Feature TRAF-PDF-2, construction of Alternative 5, like the Project, would not substantially impede public access, create severe consequences for emergency response vehicles, substantially impede travel upon a public right-of-way, or interfere with an adopted emergency response or evacuation plan. During operation, Alternative 5, as with the Project, would be required to establish, implement, and maintain an emergency response plan. The emergency response plan, which would be submitted to the LAFD for inspection and approval prior to implementation, would be inspected annually by the LAFD and include evacuation procedures. In addition, the California Fire Code, Chapter 10, Means of Egress, requires that all habitable structures comply with the California Fire Code, including providing ingress and egress during emergencies. As with the Project, compliance with existing regulations would ensure that an adequate emergency response plan is established for Alternative 5. Overall, as with the Project, impacts under Alternative 5 with respect to conflicts with or interfering with emergency response or evacuation plans would be less than significant. However, because Alternative

5 would generate less traffic and result in lower occupancy than the Project, impacts with regard to emergency response would be less than the Project.

(g) Hydrology and Water Quality

As hydrology and water quality impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of the Alternative 5 apply to both the Project and the Project with the East Site Hotel Option.

(i) Water Quality

(a) Construction

Alternative 5, as with the Project, would include construction activities, including earth moving, maintenance/operation of construction equipment, potential dewatering, and handling/storage/disposal of materials, that could contribute to pollutant loading in stormwater runoff from the construction site. Also, wind could convey exposed and stockpiled soils at the construction site into nearby storm drains during storm events, and on-site water activities for dust suppression purposes could contribute to pollutant loading in runoff from the construction site. Alternative 5 would excavate for subterranean garages to depths of approximately 44 feet deep on the East Site and 33 feet deep on the East Site; whereas, the Project would excavate for subterranean garages to depths of approximately 64 feet, with both reaching deeper levels for foundation features. Groundwater depths range from less than 49.2 bgs to approximately 98.3 feet bgs across the Project Site. Alternative 5, as with the Project, has the potential to encounter groundwater during construction. Dewatering, which is subject to LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, may be required. The potential impact related to pollutant loading or groundwater quality that would cause exceedances of water quality standards would be reduced to less-than-significant levels for Alternative 5, as well as the Project, through compliance with regulatory requirements, BMPs, and Building Code grading procedures. However, because the construction footprint and the depth of excavation under Alternative 5 would be less than the Project, the potential exposure of excavated soils to the elements and encroachment into the water table would be less than the Project. As such, the potential impact with respect to violations of water quality standards during construction under Alternative 5 would be less than the Project.

(b) Operation

Alternative 5, as with the Project, would incorporate a drainage collection and conveyance system that would detain and treat/filter runoff in compliance with the City's LID Manual requirements to reduce the quantity of, and improve the quality of, rainfall runoff leaving the Project Site. With the implementation of such system

and BMPs, Alternative 5, as with the Project, would result in an improvement in the quality of stormwater runoff from the Project Site compared to existing conditions. As with the Project, impacts related to water quality standards under Alternative 5 would be less than significant and would be similar to the Project.

(ii) Decreases in Groundwater Supplies or Recharge

Alternative 5, as with the Project, would not require groundwater withdrawal. However, similar to the Project, excavation for the foundations and the subterranean garages during construction of Alternative 5 would have the potential to intercept the groundwater table and, as such, some groundwater removal may be required during construction. Such dewatering during construction would not result in the substantial removal of groundwater that would reduce the local groundwater table. Further, dewatering would only occur temporarily during construction and would not continue post-construction.

Under Alternative 5, as with the Project, subterranean parking would be below the redeveloped areas of the Project Site, resulting in no material change to the amount of stormwater that would percolate into the groundwater table compared to existing conditions. Therefore, similar to the Project, pre- and post-Project infiltration volumes are considered effectively equivalent under Alternative 5. Accordingly, similar to the Project, there would not be a substantial reduction in groundwater recharge from current conditions and neither Alternative 5 would not introduce activities that could impede sustainable groundwater management of the basin.

Overall, neither Alternative 5 nor the Project would cause substantial depletion of groundwater supplies or substantially interfere with groundwater recharge. Therefore, the impact regarding groundwater recharge or depletion under Alternative 5 would be less than significant and similar to the Project.

(iii) Alteration of Drainage Pattern

(a) Construction

Alternative 5, as with the Project, would include construction activities that could contribute to erosion or siltation if soils are exposed during development of the Project Site. Alternative 5 would require substantially less excavation and export of materials compared to the Project. Similar to the Project, Alternative 5 would cause a temporary increase in permeable surfaces during construction that would reduce, rather than increase, off-site runoff from the Project Site during a portion of the construction. As with the Project, construction BMPs to manage runoff flows and avoid on- or off-site flooding, would be implemented under Alternative 5. As with the Project, the BMPs would reduce runoff that would potentially create or contribute runoff water exceeding the capacity of existing or planned stormwater drainage systems under Alternative 5. Although the duration of construction

activities would be less under Alternative 5 than the Project, the maximum off-site flow of Alternative 5 would be similar and the impact regarding stormwater drainage system capacity would be similar to the Project. With implementation of BMPs, impacts with respect to surface runoff, siltation, rates of runoff and capacity of drainage systems under Alternative 5, as with the Project, would be less than significant. However, because excavation volumes would be less under Alternative 5 than the Project, the potential impact under Alternative 5 would be less than the Project.

(b) Operation

Alternative 5, as with the Project, would largely maintain existing drainage patterns at the Project Site. As with the Project, Alternative 5 would include a drainage system that meets City stormwater retention, treatment and runoff requirements, including all applicable LID requirements. Additionally, under Alternative 5, as with the Project, a reduced peak flow rate of stormwater runoff from the Project Site would occur due to the retention afforded by the proposed LID system and LID BMPs. Due to similarity in site coverage and in the proposed stormwater retention system, the volume of stormwater runoff from the Project Site requiring conveyance by the existing off-site storm drain system would decrease to the same extent under Alternative 5 as with the Project. Therefore, impacts under Alternative 5 would be less than significant and similar to the Project.

(iv) Pollutant Release in Flood Hazard, Tsunami, or Seiche Zones

The Project Site is not located within a 100-year floodplain and is not in a tsunami zone and would not be subject to such flooding hazards. The Project Site is located approximately one mile from the Hollywood Reservoir. Given the distance to the Hollywood Reservoir, any oscillation and subsequent release of water within the reservoir as part of a seiche would not inundate the Project Site. Thus, there would be no potential for risk of release of pollutants due to inundation by seiche.

The Project Site is located within the Hollywood Reservoir inundation area.[56] In compliance with applicable regulatory requirements, Alternative 5, as with the Project, would implement BMPs to minimize pollutants within the Project Site during construction. Post-construction, the nature of pollutants would be typical of other developed sites within the dam inundation area. Dam safety regulations executed by the California Department of Water Resources and other agencies are the primary means of reducing damage or injury due to inundation occurring from dam failure, and reduce the likelihood of inundation. Regarding pollutant release, because Alternative 5, as with the Project, would actively maintain a stormwater management system and would be entirely developed with enclosed

56 California Department of Water Resources, Division of Safety of Dams, Dam Inundation Map for Mulholland Dam, https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2, accessed March 15, 2020.

parking, buildings, and established landscaping, the exposure of flood waters to pollutants would be minimized. Thus, in the unlikely event of on-site inundation, Alternative 5, like the Project, would not result in the release of significant types or quantities of pollutants. As with the Project, impacts with respect to a significant risk of release of pollutants to inundation by flooding, tsunami, or seiche under Alternative 5 would be less than significant and similar to the Project.

(v) Implementation of Water Quality Control Plans

Alternative 5, as with the Project, would incorporate into its design an on-site drainage system that would be consistent with water quality control plans, the policies of which are expressed in City and State water quality regulations for the protection of water resources. Alternative 5, as with the Project, falls within the jurisdiction of water quality plan regulations that assure that development projects are in compliance with clean water policies. These plans and regulations include the LARWQB (Region 4) Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties; and the NPDES stormwater permitting program. In compliance with the City's LID requirements, Alternative 5, as with the Project would install a capture and reuse system on each site. The detention would temporarily store the captured stormwater until the stored volume is entirely used through the irrigation system. The on-site drainage system would also provide BMPs in accordance with the City's LID requirements. As with the Project, impacts related to water quality control plans under Alternative 5 would be less than significant and similar to the Project.

(h) Land Use and Planning

As land use impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 5 apply to both the Project and the Project with the East Site Hotel Option.

Alternative 5 proposes up to 789,967 square feet of residential and commercial floor area, with an approximate FAR of 4.5:1 and 36,551 square feet of publicly accessible open space. The Project proposes up to 1,287,150 square feet of residential and commercial floor area with an approximate FAR of 6.973:1.[57] As with the Project, to allow for development of Alternative 5, the zoning would be amended to C2-2-SN to eliminate the D Limitation, which limits FAR to 3:1 and 2:1 on certain parcels. As with the Project, Alternative 5 would require a Conditional Use Permit to allow FAR averaging to be calculated as a whole rather than by individual parcel or lot and for a residential density transfer between the West Site and East Site. As with the Project, Alternative 5 would not conflict with applicable 2016-2040 RTP/SCS goals to facilitate land use patterns that link land use and sustainable transportation options or the Framework Element Regional Center

57 The Project with the East Site Hotel Option would provide 1,277,741 square feet of total floor area.

designation and policies that support a diversity of land uses, and provide for the spatial distribution of development that promotes a reduction of vehicle trips, VMT, and air pollution. Overall, similar to the Project, the density and location of Alternative 5 would not conflict with policies of local and regional land use plans adopted to avoid or mitigate environmental effects and, as such, impacts with respect to land use would be less than significant. Impacts in relation to existing plans that avoid or reduce environmental impacts under Alternative 5 would be similar to the Project.

(i) Noise

Maximum daily construction noise and vibration levels would be similar under the Project and the Project with the East Site Hotel Option. While the Project and the Project with the East Site Hotel Option would have nominally different daily operational mobile source noise levels, the impact conclusions, significance levels, and mitigation measures are the same for the Project and the Project with the East Site Hotel Option. Accordingly, the below comparisons of impacts of the Alternative 5 apply to both the Project and the Project with the East Site Hotel Option.

(i) Noise Levels in Excess of Standards

(a) Construction

As with the Project, Alternative 5 would entail construction activities and excavations for subterranean garages extending to 33 feet on the West Site and 44 feet on the East Site, compared to up to 64 feet (subterranean garage depth only) under the Project. These activities would require the use of heavy-duty machinery. Similar to the Project, maximum construction activities under Alternative 5 would increase noise levels at several sensitive receptor locations in the area. As with the Project, because the maximum amount of construction equipment operating simultaneously within the Project Site would be constrained by the size of the property, the maximum construction noise levels under Alternative 5 would be the same as the Project. Based on a conservative impact analysis, in which noise levels were calculated with all pieces of construction equipment operating simultaneously and located at the construction area nearest to the affected receptors, construction noise levels would exceed the applicable noise significance thresholds at several nearby noise sensitive receptors. Therefore, as with the Project, Mitigation Measures NOI-MM-1 to NOI-MM-3 would be implemented to reduce construction noise impacts at off-site noise sensitive receptors to the extent technically feasible. However, as with the Project, with implementation of technically feasible mitigation, construction noise impacts at noise-sensitive receptors 1, 3, and 5 through 13 (eleven sites) would still exceed the significance threshold under Alternative 5. Therefore, as with the Project, construction noise impacts associated with on-site noise sources would remain temporarily significant and unavoidable for Alternative 5. Similar to the Project, maximum construction traffic would not result in significant noise levels (greater

than 5 dBA L_{eq}) compared to existing traffic noise levels along any of the studied roadway segments, and impacts would be less than significant. Although construction noise levels associated with on-site noise sources would be significant and unavoidable under Alternative 5, Alternative 5 would require less excavation and scale of development. Therefore, the duration of construction noise exceedance levels would be shorter. As such, impacts related to construction noise under Alternative 5 would be less than the Project.

(b) Operation

Alternative 5, as with the Project, would increase off-site traffic and generate on-site composite noise associated with fixed equipment, vehicle activity, and human outdoor activity. However, Alternative 5 would involve a smaller scale project with fewer overall off-site vehicle trips from a maximum of 4,504 (Project with the East Site Hotel Option) to 3,006 under Alternative 5 (an approximately 33-percent reduction); therefore, operational mobile source noise impacts would be incrementally less under Alternative 5 than the Project with the East Site Hotel Option. It is acknowledged that differences in off-site mobile source noise level increases along the studied roadway segments under the Project and the Project with the East Site Hotel Option would be negligible and less than 0.1 dBA CNEL for all analyzed roadway segments. Assuming a 33-percent reduction in Alternative 5-related traffic volumes on the analyzed roadway segments compared to the Project with the East Site Hotel Option, the maximum increase in Alternative 5-related traffic noise levels over Future (2040) traffic noise levels would be approximately 0.5 dBA CNEL (from 63.9 to 64.4 dBA CNEL) along Ivar Avenue between Hollywood Boulevard and Selma Avenue and would not exceed the significance threshold of a 5-dBA CNEL. Comparatively, the Project with the East Site Hotel Option (or the Project) would result in a 0.6 dBA increase along this same roadway segment in 2040. This difference in mobile source noise would not be perceptible, and, as such, traffic noise impacts under Alternative 5 would be less than significant and similar to the Project.

With a decrease in residential units compared to the Project, operational noise levels from residential activities and functions would be less than the Project. Alternative 5 would also include a paseo, although without a performance stage near the “Hollywood Jazz: 1945-1972” mural, and as such, performance related noise from this area of the paseo would not occur. However, similar to the Project, any outdoor performances under Alternative 5 would be subject the noise restrictions in NOI-PDF-3, which would limit noise levels from adversely affecting nearby noise sensitive receptors. Thus, noise, in general, generated from the paseo under Alternative 5 at off-site noise sensitive locations would be largely similar to the Project with the outdoor performance sound restrictions in place. Overall, composite and mobile operational noise levels would be less than significant and similar to the Project.

(ii) Groundborne Noise and Vibration

(a) Construction

Construction of Alternative 5, as with the Project, would generate groundborne construction vibration during building demolition and site excavation/grading activities when heavy construction equipment is used. As with the Project, the estimated vibration velocity levels from all construction equipment (maximum construction conditions) under Alternative 5 would be below the building damage significance criteria at off-site building structures west and east of the West Site and East Site construction areas. However, as with the Project, the estimated construction vibration levels under Alternative 5 would exceed the significance threshold at the Avalon Hollywood, the Pantages Theatre, the Yucca Street Art Deco Building Storefront, the AMDA Vine building, the Argyle House, the Commercial Building at 1718 Vine Street, the Capitol Records Building, and the Gogerty Building. Therefore, vibration impacts pursuant to the significance criteria for building damage, would be significant. As with the Project, with implementation of Mitigation Measure NOI-MM-4 and compliance with LAMC Section 91.3307.1, vibration impacts associated with Alternative 5 would be reduced to less-than-significant levels for the Capitol Records and Gogerty Buildings. However, similar to the Project, because consent of off-site property owners, who may not agree, would be required to implement the vibration mitigation for potential structural damage to their off-site structures, it is conservatively concluded that structural vibration impacts on the AMDA Vine Building, the Argyle House, the Commercial Building at 1718 Vine Street, the Pantages Theatre, Avalon Hollywood, and Art Deco Building Storefront would remain significant and unavoidable because it cannot be assured that all components of NOI-MM-4 can be implemented.

Regarding human annoyance, as with the Project, the estimated vibration levels due to maximum construction activity at the West Site under Alternative 5 would exceed the significance threshold for human annoyance at vibration sensitive receptors near the Project Site. Implementation of Mitigation Measure NOI-MM-4, under Alternative 5, as with the Project, may lessen but would not reduce all human annoyance impacts to a less-than-significant level. Therefore, as with the Project, no feasible mitigation measures under Alternative 5 would reduce the temporary vibration impacts from on-site construction associated with human annoyance at the vibration-sensitive receptors 3, 5, 6, and 8 through 13. As with the Project, construction vibration levels would be significant and unavoidable under Alternative 5. However, because the overall scale of development would be reduced by approximately 38 percent under Alternative 5, the duration of construction and overall construction activity causing vibration would be less, and impacts under Alternative 5 would be less than the Project.

(b) Operation

Day-to-day operations under Alternative 5, as with the Project, would include typical commercial-grade stationary mechanical and electrical equipment, which would produce vibration at low levels that would not cause damage or annoyance impacts to on-site or off-site environment. Primary sources of transient vibration would include vehicle circulation within the proposed parking areas, which would be confined to the immediate area and would not be expected to be perceptible off the Project Site. It is anticipated that mechanical equipment, including air handling units, condenser units, and exhaust fans, under Alternative 5, as with the Project, would be located on building rooftops. Therefore, as with the Project, groundborne vibration from the operation of such mechanical equipment under Alternative 5 would not impact any of the off-site sensitive receptors. Thus, similar to the Project, operational vibration impacts under Alternative 5 would be less than significant. As Alternative 5 would reduce the overall occupancy of the Project Site, off-site groundborne operation vibration is not anticipated to be perceptible under Alternative 5, and, such, impacts under Alternative 5 would be similar to the Project

(j) Population and Housing

During operation, the Project and the Project with the East Site Hotel Option would have different population, housing, and employment generation statistics. However, both development scenarios would result in the same impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of Alternative 5 apply to both the Project and the Project with the East Site Hotel Option.

Alternative 5, as with the Project, would increase occupancy and use of the Project Site. Alternative 5 would provide 672 market rate units, a reduction of approximately 33 percent, compared to the Project, and would generate approximately 1,627 new residents.[58] Retail and restaurant uses under Alternative 5 would generate approximately 206 employees.[59] The Project would provide 1,005 residential units, generating approximately 2,433 new residents, and would include 30,176 square feet of retail/restaurant uses, which would generate approximately 206 employees. The Project with the East Site Hotel Option would provide 884 residential units and generate approximately 2,140 new residents. The Project with the East Site Hotel Option, based on 130,278 square feet of hotel floor area, would also generate approximately 239 employees[60] and its retail/restaurant

58 Based on 2017 Census American Community Survey 5-Year Estimate data (2013–2017), www.census.gov/programs-surveys/acs/technical-documentation/table-and-geography-changes/2015/5-year.html, per correspondence with Jack Tsao, Housing Planner, Los Angeles Department of City Planning, July 31, 2019.

59 Based on HR&A Economic and Fiscal Impact Report evaluation in which the factor for the Project's retail/restaurant uses would be one employee per 146.5 square feet of floor area.

60 Based on HR&A Economic and Fiscal Impact Report evaluation in which the factor for the Project's retail/restaurant uses would be one employee per 545 square feet of hotel floor area.

uses would generate approximately 206 new employees, for a total of approximately 445 new employees. As with the Project, additional employees may be associated with on-site security and maintenance under Alternative 5.

Alternative 5 would generate a population increase of 1,627 new residents, which would represent approximately 0.67 percent of SCAG's 2018-2027 population growth projection of 241,442 and approximately 0.26 percent of SCAG's 2018-2040 population growth projection of 635,275. Alternative 5's 206 new employees would represent approximately 0.14 percent of SCAG's 2018-2027 employment growth projection of 146,255 and approximately 0.06 percent of SCAG's 2019-2040 employment growth projection of 320,375. Alternative 5, as with the Project, would not exceed SCAG's growth projections, would help the City meet its housing obligation under SCAG's RHNA allocation, and would provide the type of transit oriented development encouraged in the Los Angeles General Plan and SCAG 2016-2040 RTP/SCS policies. No existing residences would be displaced. As such, Alternative 5, as with the Project, would result in a less than significant population and housing impacts. Although Alternative 5 would not implement the objectives of SCAG's RHNA allocation or concentrate transit-oriented development to the same extent as under the Project, because SCAG population and housing projections would not be exceeded, impacts with respect to substantial unplanned population growth under Alternative 5 would be less than significant and similar to the Project.

(k) Public Services

During operation, the Project and the Project with the East Site Hotel Option would have different service-related population statistics, such as number of residents or students. However, both development scenarios would result in the same impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of Alternative 5 apply to both the Project and the Project with the East Site Hotel Option

(i) Fire Protection

Alternative 5, as with the Project, would involve construction activities and intensify the use of the Project Site so that it would increase demand on fire protection and emergency medical services, as well as potentially reduce emergency access. Alternative 5, as with the Project, would incorporate Project Design Feature TRAF-PDF-2 to provide a Construction Traffic Management Plan to improve vehicular access around the construction site. Project Design Feature TRAF-PDF-3 would identify and enforce parking location requirements for construction workers. The implementation of these Project Design Features would facilitate emergency access. As such, similar to the Project, construction under Alternative 5 would result in less-than-significant impacts with respect to emergency response times and emergency access.

During operation, Alternative 5 would result in a population increase of 1,627 persons and 206 employees. By comparison, the Project would result in a population increase of 2,433 persons and 206 new employees. The Project with the East Site Hotel Option would result in a population increase of 2,140 persons and 445 employees. Alternative 5, as with the Project, would comply with the applicable OSHA, Building Code, Fire Code, other LAMC, and LAFD requirements and recommendations, which would reduce demand on LAFD facilities and equipment without creating the need for new or expanded fire facilities. In addition, the Project Site is located within a highly urbanized area accessed via an established street system and within the LAFD's maximum prescribed response distances. Due to urban proximity and facilitated travel for high priority emergency calls, impacts on emergency response would not be significant. Alternative 5, as with the Project, would also be consistent with LAMC fire flow requirements. As such, Alternative 5, as with the Project, would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. Impacts under Alternative 5, as with the Project, would be less than significant. However, because Alternative 5 would reduce construction duration and Project Site occupancy (employees and residents) compared to the Project, impacts related to fire protection services under Alternative 5 would be less than the Project.

(ii) Police Protection

Alternative 5, as with the Project, would result in construction and operation activities that could affect emergency access and increase demand for police protection services. As with the Project, Alternative 5's construction phase, although of shorter duration than that of the Project, could increase potential demand for LAPD services related to theft or vandalism and increased worker activity, as well as construction traffic that could affect emergency response times. To reduce LAPD demand during construction, Alternative 5, as with the Project, would implement a number of security measures under Project Design Feature POL-PDF-1 to limit access to construction areas, including private security, construction fencing, and locked entry. Similar to the Project, construction activities under Alternative 5 may involve temporary lane closures or increase travel time due to flagging or stopping traffic to accommodate trucks entering and exiting the Project Site. Under Project Design Feature TRAF-PDF-2, a Construction Traffic Management Plan would ensure that adequate and safe access remains available at the Project Site during construction activities. Project Design Feature TRAF-PDF-3 would implement a Construction Worker Parking Plan to identify and enforce parking location requirements for construction workers. As with the Project, most construction staging for Alternative 5 would occur on the Project Site, and construction workers would generally start and end their work days in advance of peak traffic hours; thus, reducing their potential effect on traffic and emergency

response times. Furthermore, construction-related traffic generated by Alternative 5, as with the Project, would not significantly impact LAPD response times within the Project vicinity as LAPD vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic during construction.

According to LAPD service population generation factors,[61] assuming that 85 percent of Alternative 5's 672 residential units (571 units) were one- and two-bedroom, which would generate an estimated service population gain of 1,713 residents, and 15 percent of Alternative 5's 672 units (101 units) were three-bedroom or more, which would generate a gain of 404 residents, Alternative 5 would result in a gain of 2,117 in residential service population. Alternative 5's 30,176 square feet of retail/restaurant floor area would generate a total of 91 employees. In total, Alternative 5 would increase the LAPD service population by 2,208. According to the same crime factors used by the Project, the increase in service population generated by Alternative 5 could result in 34 crimes per year.[62] In comparison the Project and the Project with the East Site Hotel Option would result in 49 and 48 crimes per year, respectively.

The LAPD determines the need for new officers based on a variety of non-definitive factors (i.e., shifts in station and/or patrol boundaries, ongoing staff changes, service populations and crime statistics may be considered when new officers are hired). Alternative 5, as with the Project, would incorporate Project Design Feature POL-PDF-2 to provide a 24-hour/seven-day security program to ensure the safety of its residents, employees, and site visitors. These measures would reduce demand on police services during operation. Similar to the Project, with the implementation of these features, Alternative 5 would not increase police services demand to the extent that the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, Alternative 5, as with the Project, would not result in potential physical impacts associated with construction of police facilities and impacts with respect to police protection would be less than significant. However, with the reduction in scale of development and occupancy under Alternative 5, impacts to police protection services under Alternative 5 would be less than the Project.

(iii) Schools

Alternative 5 would result in 333 fewer residential units than the Project and 212 fewer residential units than the Project with the East Site Hotel Option. Alternative 5 would generate approximately 163 elementary school students, 45 middle school

61 LAPD service population generation factors are: 3 residents per one- and two-bedroom units, 4 residents per three-bedroom unit, and 3 residents per kfs commercial floor area.

62 Crime total rounded up to next whole number.

students, and 94 high school students totaling 302 students.[63,64] In contrast, the Project and the Project with the East Site Hotel Option would generate 441 students and 424 students, respectively. Similar to the Project, the additional students generated by Alternative 5 could potentially exceed the number of seats available at local schools. However, pursuant to Section 65995 of the California Government Code, the Project Applicant would be required to pay fees in accordance with SB 50. Payment of such fees is intended for the general purpose of addressing the construction of new school facilities, whether schools serving the Project are at capacity or not and, pursuant to Section 65995(h), payment of such fees is deemed to be full mitigation of a project's development impacts. As such, impacts to school facilities and services under Alternative 5 would, as with the Project, would be less than significant. However, because Alternative 5 would generate fewer school-age children than the Project, impacts on schools would be less than the Project.

(iv) Parks and Recreation

Alternative 5 would generate approximately 1,627 new residents that would utilize parks and recreation facilities. In contrast, the Project and the Project with the East Site Hotel Option would generate approximately 2,433 new residents and 2,140 residents respectively. Alternative 5, as with the Project, would comply with LAMC Section 21.10.3, which requires a dwelling unit construction tax of $200 for each new residential unit for City acquisition of new park space. Furthermore, Alternative 5, as with the Project, would meet the requirements of LAMC Sections 12.21 and 17.12, and 21.10.3(a)(1) regarding the provision of useable open space. Although Alternative 5, as with the Project, would not meet the parkland provision goals set forth in the PRP, which recommends 2.0 acres each of neighborhood and community recreational sites and facilities per 1,000 residents and 6.0 acres of regional recreational sites and facilities per 1,000 residents, these are Citywide goals and are not intended to be requirements for individual development projects. Thus, similar to the Project, operation of Alternative 5 would not exacerbate the existing shortfalls in parkland relative to City standards to the extent that new or physically altered park or recreational facilities would need to be constructed, the construction of which would cause significant adverse physical environmental impacts. Similar to the Project, impacts with respect to parks and recreation would be less than significant under Alternative 5. However, since Alternative 5 would generate less population and a proportionate decrease in demand for park space than the Project, impacts would be less than the Project.

63 Student generation rates per household for residential uses are based on Table 3 of the LAUSD 2018 Developer Fee Justification Study: Elementary = 0.2269; Middle School = 0.0611; High School = 0.1296.

64 For the restaurant/retail uses, the student generation rate of 0.610 student per 1,000 square feet is based on the Neighborhood Shopping Centers rate as provided in Table 15 of the LAUSD 2018 Developer Fee Justification Study. The students are distributed as follows: 54 percent elementary school, 15 percent middle school, and 31 percent high school.

(v) Libraries

Alternative 5's residential population, as with the Project, would increase demand for library services. The LAPL has indicated they have no plans for a new branch library in the Project vicinity. As with the Project, there are also three libraries within one-mile of the of the Project Site which could serve Alternative 5. Furthermore, in consideration of the Project's ability to provide internet service, generate revenue to the City's General Fund, and LAPL's ongoing expansion and availability of online resources, similar to the Project, Alternative 5's increase in demand to any one local library would not be expected to result in a substantial increase in demand that would necessitate new or physically altered facilities. Therefore, similar to the Project, Alternative 5 would not create the need for new or physically altered library facilities, the construction of which would result in substantial adverse physical environmental impacts, in order to maintain acceptable service ratios or objectives. Therefore, as with the Project, impacts to libraries under Alternative 5 would be less than significant. However, because Alternative 5 would generate less population, impacts relative to libraries would be less than the Project.

(l) Transportation

During operation, the Project and the Project with the East Site Hotel Option would have different overall VMT and VMT per capita statistics. However, both development scenarios would result in the same transportation-related impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of Alternative 5 apply to both the Project and the Project with the East Site Hotel Option.

(i) Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities

Alternative 5, as with the Project, would support multimodal transportation options and a reduction in VMT, as well as promote transportation-related safety in the Project area. Alternative 5, as with the Project, would not conflict with policies of Mobility Plan 2035 and the City of Los Angeles Complete Streets Design Guide, adopted to protect the environment and reduce VMT. Similar to the Project, Alternative 5 would also be consistent with applicable transportation goals of the Hollywood Community Plan and the Hollywood Redevelopment Plan. Project Design Feature TRAF-PDF-1 under Alternative 5, as well as the Project, would implement a TDM Program to address parking, transit, commute trip reductions, shared mobility, bicycle use, and pedestrian access, and TDM management strategies. TDM measures to promote bicycle use include bicycle parking spaces, bike lockers, and showers for residents, employees, and visitors. Alternative 5, as with the Project, would not conflict with VisionZero to reduce traffic-related deaths;

with LAMC Section 12.37 regarding street standards; with LADOT MPP, Section 321, regarding driveway design standards, or with the 1988 Hollywood Community Plan's Objective 6 to coordinate land use densities and to promote the use of transit. Alternative 5, as with the Project, would increase population density in close proximity to the Metro Red Line Hollywood/Vine Station, other regional Metro bus lines, and the LADOT DASH lines. Alternative 5, as with the Project, would also provide for road and pedestrian improvements, including a paseo linking the West Site and East Site and new median improvements along Vine Street, which would enhance pedestrian safety. A signalized mid-block crosswalk is proposed across Argyle Avenue to help facilitate local pedestrian circulation and access by maintaining a path of east-west travel with the existing mid-block crosswalks across Ivar Avenue and Vine Street. Similar to the Project, Alternative 5 would not conflict with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities and, as such, impacts relative to plans and programs would be less than significant and similar to the Project.

(ii) Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)

As required under CEQA Guidelines Section 15064.3(b) and based on proposed land uses, floor areas, and TDM measures incorporated under Project Design Feature TRAF-PDF-1 (Transportation Demand Management Program), VMT standards would be applicable to Alternative 5, as well as the Project. Alternative 5 would have a household VMT of 4.7 per capita.[65] The Project would have a household per capita VMT of 4.8. Both Alternative 5 and the Project with less than 50,000 of retail use would be exempt from an employee VMT per capita finding. The Project with the East Site Hotel Option would have a household VMT of 4.7 per capita and a work VMT of 4.8. These rates are all below the thresholds of significance proposed for the City's Central APC household per capita of 6.0 and work VMT of 7.6. per employee. As such, similar to the Project, impacts under Alternative 5 would be less than significant. As Alternative 5's household VMT per capita is lower, impacts with respect to CEQA Guidelines Section 15064(b) would be less than the Project.

(iii) Design Hazards

Alternative 5, as with the Project, would reduce existing curb cuts and provide new sidewalks around the perimeter of the Project Site. As with the Project, improvements under Alternative 5 would include a signalized mid-block crosswalk provided across Argyle Avenue to help facilitate local pedestrian circulation and access. As with the Project, Alternative 5 would provide a paseo through the Project Site between Argyle Avenue and Ivar Avenue. Alternative 5, as with the

65 Fehr and Peers, Alternatives Transportation Analysis, March 2020, Appendix R of this Draft EIR.

Project, would eliminate driveway crossings on Vine Street. Access to the Capitol Records Complex (including both the Capitol Records Building and the Gogerty Building) would continue to be provided via the existing driveway on Yucca Street. Similar to the Project, total existing curb cuts would be reduced from 12 total to a total of five. The driveways would not require the removal or relocation of existing passenger transit stops, and would be designed and configured to avoid potential conflicts with transit services and pedestrian traffic. Alternative 5, as with the Project, would not substantially increase hazards, vehicle/pedestrian conflict, or preclude City action to fulfill or implement projects associated with these networks. Similar to the Project, Alternative 5 would contribute to overall walkability through enhancements to the Project Site, streetscape, and crossing of Argyle Avenue, and would not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. Impacts under Alternative 5 would be less than significant and similar to the Project

(iv) Emergency Access

The Project Site is located in an established urban area served by the surrounding roadway network, and multiple routes exist in the area for emergency vehicles and evacuation. Drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Similar to the Project, no policy or procedural changes to an existing risk management plan, emergency response plan, or evacuation plan would be required due to implementation under Alternative 5. All driveways and the internal circulation would be subject to LAFD review to confirm adequate access is provided internally for on-site emergency vehicle access. With review and approval of Project Site access and circulation plans by the LAFD, Alternative 5, as with the Project, would not impair implementation of or physically interfere with adopted emergency response or emergency evacuation plans. Impacts regarding emergency access under Alternative 5 would be less than significant and similar to the Project.

(m) Tribal Cultural Resources

As tribal cultural resources impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparison of impacts of Alternative 5 apply to both the Project and the Project with the East Site Hotel Option.

The City complied with AB 52 in its consultation and records searches conducted through SCCIC and the NAHC for the Archaeological and Paleontological Resources Assessment. The research indicated no known tribal cultural resources within the Project Site or surrounding area. However, as with the Project excavations associated with Alternative 5 could have a potential, albeit a low potential, to encounter previously unknown and buried tribal cultural resources. However, similar to the Project, in the event that buried tribal cultural resources are encountered during construction under Alternative 5, the Project Applicant will

be required to comply with the City's standard Conditions of Approval for the treatment of inadvertent Tribal cultural resource discoveries. With compliance, Alternative 5, as with the Project, would result in less-than-significant impacts to tribal cultural resources. As excavation depths would be less under Alternative 5, impacts to tribal cultural resources under Alternative 5 would be less the Project.

(n) Utilities and Service Systems – Water, Wastewater, and Solid Waste

During operation, the Project and the Project with the East Site Hotel Option would have different utility demand statistics (i.e., water demand, wastewater generation, and solid waste generation). However, both development scenarios would result in the same impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of Alternative 5 apply to both the Project and the Project with the East Site Hotel Option.

(i) Wastewater

Alternative 5 would generate additional wastewater and increase demand on the existing Hyperion Treatment Conveyance System and Hyperion Treatment Plant. **Table V-9**, *Alternative 5 Wastewater Generation During Operation*, summarizes Alternative 5's approximate wastewater generation. Table V-9 assumes that 45 percent of Alternative 5's 672 residential units would be one-bedroom, 40 percent would two-bedroom units, and 15 percent would be three-bedroom units, and that indoor amenities, spa/health club, retail/restaurant space, and swimming pool areas would be similar to those of the Project.

TABLE V-9
ALTERNATIVE 5 WASTEWATER GENERATION DURING OPERATION

Land Use	Units	Generation Rate (gpd/unit)[a]	Total Wastewater Generation (gpd)
Residential: Apartment – 1 Bedrooms	301 du	110/du	33,110
Residential: Apartment – 2 Bedrooms	270 du	150/du	40,500
Residential: Apartment – 3 Bedrooms	101 du	190/du	19,100
Retail/Restaurant Lobbies	16,248 sf	50/1,000 sf	844
Restaurant: Full Service Indoor Seat[b]	1,232 seats	30/seat	36,960
Indoor Amenities	23,916 sf	50/1,000 sf	1,196
Health Club/Spa	9,337 sf	650/1,000 sf	6,069
Swimming Pools[c]	10,165 cf	7.4805/cf	76,036
Cooling Towers	7,971 sf	170/1,000 sf	1,355
		Total	**215,170 gpd**

Acronyms: du = dwelling units; sf = square feet, gpd = gallons per day, cf = cubic feet

[a] The generation rates are based on the LASAN sewerage generation factors.

[b] To calculate the number of seats, 1 seat per 15 sf of dining area (or 1 seat per 24.49 sf of restaurant floor area was assumed. To be conservative, the calculation assumes the Alternative's entire retail/restaurant floor area of 30,176 sf would be restaurant uses.

[c] Includes two moderate-sized swimming pools.

SOURCE: ESA, 2020

As shown in Table V-9, Alternative 5 is estimated to generate approximately 215,170 gpd, or 0.215 mgd. [66] In comparison, the Project is estimated to increase on-site wastewater generation by 311,680 gpd, or approximately 0.312 million mgd and the Project with the East Site Hotel Option is anticipated to generate 322,067 gpd, or approximately 0.322 mgd. These estimates do not account for reductions in wastewater generation that would occur with implementation of conservation measures. Similar to the Project, the increase in wastewater generation by Alternative 5 would be within the capacity limits of the conveyance and treatment facilities serving the Project Site. Similar to the Project, impacts on wastewater conveyance and treatment systems under Alternative 5 would be less than significant. However, because Alternative 5 would generate a lower volume of wastewater, impacts under Alternative 5 would be less than the Project.

(ii) Water Supply

Alternative 5 would increase demand on water supplies and infrastructure. Based on wastewater generation factors shown in Table V-5, residential, commercial, and recreational uses provided under Alternative 5 would generate a maximum day water demand of 215,170 gpd, which includes water demand from draining the pools entirely. However, draining the pools would occur very infrequently and on average over the course of a year, pool-related water demand would average less than approximately 500 gallons per day. Thus, the water demand analysis below is based on this average pool daily water demand to provide a reasonable assessment of yearly water demand. Additional water would be required for landscaping and indoor parking structure space. As under the Project, landscaping would require approximately 2,227 gpd and indoor parking space would require approximately 445 gpd of water. Alternative 5's maximum daily water demand is estimated to be 217,842 gpd prior to water conservation measures. Water conservation measures under the City's Ordinance No. 184,248, the 2017 Los Angeles Plumbing Code, and the 2017 Los Angeles Green Building Code, and implementation of the Applicant's water conservation efforts and Project Design Feature WS-PDF-1 would result in a savings of approximately 39 percent (as assumed for the Project as well and excludes swimming pools). Assuming a water demand of 500 gallons per day for the swimming pool, Alternative 5's average daily water demand would be would typically be less than approximately 87,002 gpd (97 afy).[67]

66 As shown in Table V-9, the total amount of wastewater generation for swimming pools is 76,036 gpd. This circumstance would occur only if the swimming pools were all drained on any given day. Daily wastewater generation for the swimming pools would typically be less than approximately 500 gallons per day. As such, this analysis is conservative in presenting the maximum wastewater generation scenario for swimming pools.

67 Alternative 5 Land Uses from Table V-9 excluding pools (139,134 gpd) + Landscaping (2,227 gpd) + Indoor Parking (445 gpd) = 141,806 gpd. Then, 61% X 141,806 gpd = 86,502 gpd. Then, 86,502 gpd + 500 gpd (pools) = 87,002 gpd.

In comparison, the Water Supply Assessment for the Hollywood Center Project indicated the Project and the Project with the East Site Hotel Option would have a water demand of 163,098 gpd (~183 afy) and 182,896 gpd (~205 afy), respectively, accounting for water conservations and compliance with applicable regulations.[68] Similar to the Project, Alternative 5's water demand projections would be within LADWP's 2015 UWMP's projected increases in Citywide water demands, while anticipating multi-dry year water conditions through the planning horizon of 2040.

Furthermore, similar to the Project, operation of Alternative 5 would require new connections from existing facilities. With regulatory compliance to the LAMC and coordination with LADWP, operation of Alternative 5, as with the Project, would not result in the relocation or construction of new or expanded water facilities, the construction or relocation of which would cause significant environmental effects. Similar to the Project, operational impacts on water infrastructure under Alternative 5 would be less than significant.

Based on the above, while Alternative 5 and the Project would result in less than significant water supply and infrastructure impacts, because Alternative 5 would result in less average daily water demand compared to the Project, impacts would be less under Alternative 5 than the Project.

(iii) Solid Waste

Alternative 5, as with the Project, would increase solid waste generation at the Project Site that would need to be landfilled. The construction of Alternative 5 would generate less construction waste due the approximately 38 percent reduction in total floor area (789,921 square feet under Alternative 5 compared to 1,287,150 square feet under the Project). The maximum construction waste under the Project would represent a small fraction of the available capacity of the County's Azusa Land Reclamation landfill or one of the inert debris engineered fill operations in Los Angeles County. As such, impacts associated with construction under the Project and Alternative 5 would be less than significant. However, because construction materials would be less under Alternative 5, it would have less impact with respect to construction waste than the Project.

During operation, Alternative 5's 672 residential uses would generate approximately 8,286 pounds of solid waste per day (based on 12.33 pounds per day per unit) or approximately 1,512.2 tons per year. The retail/restaurant uses, which are the same as under the Project, would generate approximately 2,159 pounds per day, or 336.8 tons per year. Before diversion, Alternative 5 would generate approximately 10,445 pounds per day or 1,849 tons per year. After implementation of the City's 65 percent diversion rate, Alternative 3 would generate approximately 1.77 tpd or 647.2 tons of solid waste per year. The

68 LADWP, WSA for the Hollywood Center Project, December 11, 2018, pp. 11 and 12. Provided in Appendix P-2 of this Draft EIR.

Sunshine Canyon Landfill, the primary recipient of Class III solid waste from the City, has a maximum daily capacity of 12,100 tpd and a disposal rate of 6,765 tpd, indicating a residual daily capacity of 5,355 tpd. Alternative 3's addition of 2.07 tpd[69] landfill disposal rate would represent approximately 0.04 percent of Sunshine Canyon's residual daily capacity, assuming diversion.

By comparison, the Project, which would have a higher disposal rate than the Project with the East Site Hotel Option, would generate approximately 2,639 tons of solid waste per year and approximately 7.23 tons of solid waste per day. After implementation of the City's 65-percent diversion rate, the Project would generate approximately 923.65 tons of solid waste per year or 2.53 tons of solid waste per day, which would be 2.96 tpd landfill disposal rate.

Similar to the Project, Alternative 5's additional solid waste generation would be accommodated by the County's City-certified waste processing facilities. As with the Project, Alternative 5's 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. Similar to the Project, impacts with respect to solid waste under Alternative 5 would be less than significant. However, because Alternative 5 would reduce solid waste compared to the Project, impacts under Alternative 5 would be less than the Project.

(o) Energy Conservation and Infrastructure

During operation, the Project and the Project with the East Site Hotel Option would have different energy consumption statistics. However, both development scenarios would result in the same impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of Alternative 5 apply to both the Project and the Project with the East Site Hotel Option.

(i) Efficient Energy Consumption

Alternative 5, as with the Project would incorporate energy-conservation measures beyond regulatory requirements as specified in Project Design Features GHG-PDF-1 and WS-PDF-1. These require USGBC LEED Gold Certification energy performance optimization features such as reducing building energy cost by a minimum of 11.6 percent for new construction compared to the 2019 Title 24 Building Energy Efficiency Standards and installing energy efficient appliances. As with the Project, Alternative 5 would comply with and exceed existing minimum energy efficiency requirements, such as the Title 24 standards and CALGreenCode, including for building rooftops to be solar-ready so that on-site solar photovoltaic or solar water heating systems could be installed in the future. Alternative 5, as with the Project, would be designed to exceed ASHRAE 90.1-

69 Alternative 5's daily disposal in tons assumes that landfills operate six days per week; 52 weeks * 6 days = 312 days. Therefore, the daily disposal is calculated by 647.2 tons / 312 days = 2.07 tpd.

2010 standards by more than 20 percent through the use of efficient heating, ventilation, and HVAC systems and a high-performance building envelope. Indoor air quality would be enhanced through the selection of low-VOC emitting materials, and exhaust systems would be utilized for optimal ventilation in both kitchens and bathrooms. Alternative 5, as with the Project, would meet the requirements of the Los Angeles Green Building Code and the CALGreen Code regarding on-site renewable energy sources.

Alternative 5, as with the Project, would be consistent with and not conflict with SCAG's land use type for the area and would encourage alternative transportation, and achieve a reduction in VMT resulting in a transportation efficiency level better than the Hollywood neighborhood and City and statewide average. Alternative 5, as with the Project would not cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation and, as such, impacts related to efficient energy consumption would be less than significant. With the reduction in floor area of approximately 38 percent compared to the Project, Alternative 5 would generate a lower level of energy demand than would the Project. Thus, impacts related to efficient energy consumption as with the Project would be less than significant and, because the scale of development would be less, impacts with respect to energy consumption would be less than the Project.

(ii) Conflict with Plans for Renewable Energy or Energy Efficiency

As with the Project, Alternative 5 would comply with existing energy standards, would include a project design and building operation that would incorporate energy-conservation measures beyond those otherwise required, and would not conflict with adopted energy conservation plans. Alternative 5, as with the Project, would be designed to meet the USGBC LEED Gold Certification including energy performance optimization features, such as reducing building energy demand by a minimum of 11.6 percent for new construction compared to the 2019 Title 24 Building Energy Efficiency Standards. Among other features it would install energy efficient appliances that meet the USEPA ENERGY STAR rating standards or equivalent; incorporate heat island reduction strategies, such as high-reflectance and vegetated roofs for the Project roof areas; provide water efficient fixtures and landscaping to reduce indoor water usage; and provide an HVAC system that would be sized and designed in compliance with the CALGreen Code to maximize energy efficiency caused by heat loss and heat gain. Alternative 5, as with the Project, would have the same automobile fuel efficiencies associated with access to alternative modes of transportation.

By exceeding the regulatory standards, similar to the Project, Alternative 5 would have a less-than-significant impact regarding the provisions of plans for renewable energy and energy efficiency. As Alternative 5 would be in compliance with plans

for renewable energy and energy efficiency, impacts under Alternative 5 would be similar to the Project.

(iii) Relocation or Expansion of Energy Infrastructure

Alternative 5, as with the Project, would utilize energy infrastructure to accommodate their respective demand for energy resources. Similar to the Project, Alternative 5's electricity and natural gas demands are expected to represent a small fraction of LADWP and SoCalGas energy supplies and the service provider's existing infrastructure. As concluded in Section IV.O, *Energy Conservation and Infrastructure*, of this Draft EIR, planned electricity and natural gas supplies would be sufficient to meet the Project's demand for electricity and natural gas. As with the Project, Alternative 5 would not result in an increase in demand for electricity or natural gas services that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Similar to the Project, impacts with respect to the relocation or expansion of energy infrastructure under Alternative 5 would be less than significant. As off-site energy infrastructure would accommodate energy demand under Alternative 5, impacts would be similar to the Project.

(3) Relationship of the Alternative to Project Objectives

As described above, Alternative 5, the Proposed Community Plan Update-Compliant Alternative, would consist of four residential buildings, two of which would contain retail/restaurant uses. The taller buildings would rise to 29 stories on the East Site and 20 stories on the West Site. Proposed land uses include 583 market rate residential units, 89 senior affordable units, and 30,176 square feet of retail/restaurant uses. Alternative 5 would reduce the Project's total floor area by approximately 38.6 percent. Alternative 5 would include 36,551 square feet of publicly accessible open space and a paseo running between Argyle Avenue and Ivar Avenue.

Alternative 5 would maintain views of the Capitol Records Building through building setbacks and the open paseo running between Ivar Avenue and Argyle Avenue. It would incorporate senior affordable residential units, and it would also be constructed to meet LEED-Gold equivalent standards. As such, it would be fully consistent with the following Project Objectives:

3. Develop architecturally distinct buildings that are compatible with the Capitol Records Complex through a design that responds to the Capitol Records Building's modernist architectural character, and preserve views of the Capitol Records Building.

6. Provide affordable senior housing with outdoor spaces in proximity to public transportation, allowing an age-specific demographic to continue to live in their residence of preference while maintaining access to services and goods.

7. Cluster jobs and housing near transit by locating a high-density, mixed-use development within a Transit Priority Area.

10. Incorporate sustainable and green building design and construction to promote resource conservation, including waste reduction, efficient water management techniques, and conservation of energy to achieve a LEED-Gold equivalent building.

Although Alternative 5 would provide for mixed use development, because of its substantially reduced scale, it would not rise to the same landmark status as under the Project or create a similar hub of activity, maximize infill development or reduce VMT, cluster jobs and housing near transit, or activate the Hollywood area to the same extent as under the Project. In addition, Alternative 5 would reduce the Project's setback between the Capitol Records Building and the East Building (reducing the width of the view corridor) and would comparatively constrain views of the Capitol Records Building compared to the Project. Therefore, it would not meet the following objectives to the same extent as under the Project and is, thus, considered to be only partially consistent with the following objectives:

1. Redevelop the Project Site, with a mixed-use development that protects the architectural and historical heritage of the Capitol Records Complex and activates Hollywood Boulevard, Vine Street, and surrounding streets through connected, publicly available landscaped open space, including a paseo with shopping, seating, open air dining, and art installations, and plazas accommodating performances and community focused events.

2. Create a hub of activity surrounding the Capitol Records Complex and the intersection of Hollywood Boulevard and Vine Street, by activating the eastern end of Hollywood Boulevard and the terminus of the Hollywood Walk of Fame, to increase engagement with the Capitol Records Complex.

4. Maintain prominent views of the Capitol Records Building by providing building setbacks, visual buffers, open space between the Project's new buildings and the Capitol Records Complex, and safe public viewing areas from the proposed paseo and plazas, to maximize view corridors and continue showcasing its distinctive architectural design.

5. Promote local, regional, and State land use and mobility objectives to reduce vehicle miles traveled (VMT) by maximizing infill development within an existing Regional Center near jobs, retail, and entertainment in proximity to transit and transportation infrastructure that encourages pedestrian activity.

8. Support the growth of the City's economic base through the introduction of an economically viable project which creates a significant number of construction and permanent jobs.

9. Activate the Hollywood area with commercial opportunities that could serve local employees, generate local tax revenues, and provide new permanent jobs and housing for residents in support of local business.

f) Alternative 6: Above-Grade Parking Alternative

(1) Description of the Alternative

The Above-Grade Parking Alternative (Alternative 6) would replace the Project's subterranean parking with parking podiums that would provide parking, similar to the Project, in excess of Code-required parking. Alternative 6 would provide 480 parking spaces on the East Site in an 11-level, parking podium and 1,041 parking spaces in a five-level, parking podium on the West Site, for a total of 1,521 parking spaces. The parking podiums would accommodate parking for all on-site uses. This Alternative would exceed the LAMC parking requirements of 1,513 spaces by eight (8) spaces. Bicycle parking would be provided in accordance with LAMC requirements.

Consistent with the Project, Alternative 6 would provide the same amount of retail/restaurant square footage (30,176 square feet) and the same total number of residential units (1,005 units), including the same number of market-rate (872) and senior affordable units (133). Also consistent with the Project, Alternative 6 would include 423 market-rate units and 65 senior affordable units on the East Site; and 449 market-rate units and 68 senior affordable units on the West Site. Alternative 6, however, would have a total floor area of 1,286,634 square feet and a 6.972:1 FAR, or 516 square feet less than the Project and just below the Project's 6.973:1 FAR.[70]

As shown in **Figure V-13**, *Building Massing for Alternative 6*, residential components of Alternative 6 would be provided within four buildings, two each on the East and West Sites, with retail and restaurant uses incorporated into the ground level, similar to the Project. The 46-story East Building would reach a height of 545 feet at the top of the 46th story and 595 feet at the top of the bulkhead. The East Senior Building would be located above the East Site parking podium. The East Senior Building would reach a height of 240 feet at the top of the 21st story and 260 feet at the top of the bulkhead. The ground floor of the 11-level parking podium beneath the East Senior Building would include parking and a lobby for the East Senior Building. Levels 2-11 would be parking only, and Levels 12-21 would include the senior affordable units. The parking podium would extend to and

70 The minor difference in total floor area between the Project and Alternative 6 is due to the differences in design.

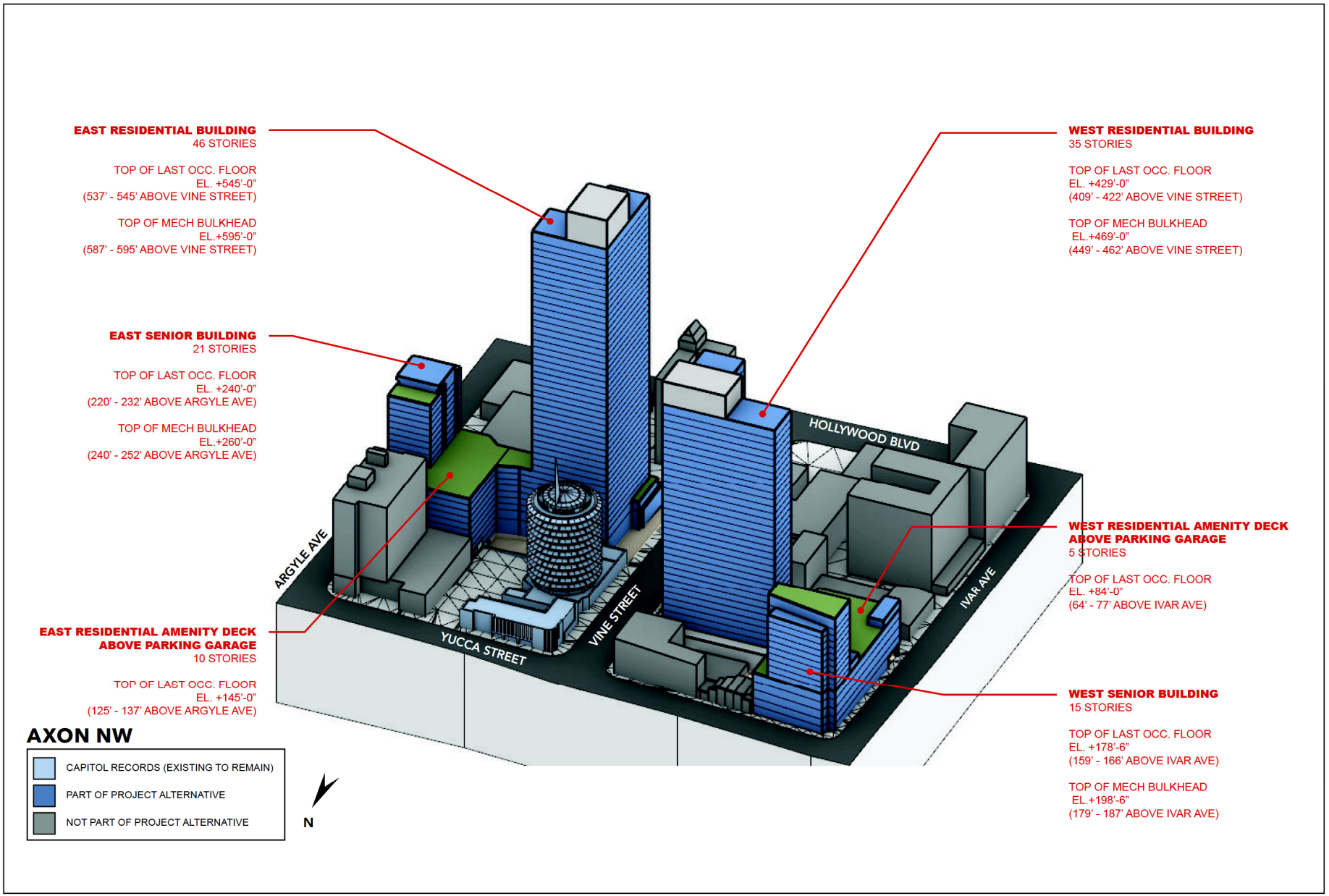
connect with the East Building, providing parking on Levels 2-11 beneath the amenity deck. The amenity deck would be located on 12th level of the East Site parking podium and would be available to Project residents. The amenity deck would include similar recreational and open space features as the Project.

The 35-story West Building would reach a height of 429 feet at the top of the 35th story and 469 feet at the top of the bulkhead.[71] The West Senior Building would be located above the West Site parking podium. The West Senior Building would reach a height of 179 feet at the top of the 15th story and 198.5 feet at the top of the bulkhead. The ground floor of the five-level parking podium beneath the West Senior Building would include commercial space, parking and a lobby for the West Senior Building. Levels 2-5 beneath the West Senior Building would be parking only, and Levels 6-15 would include the senior affordable units. The parking podium would extend to and connect with the West Building, providing parking on Levels 1-4 beneath the amenity deck. The amenity deck would be located on the 5th level of the West Site parking podium and would be available to Project residents. The amenity deck would include similar recreational and open space features as the Project.

While the proposed mix of uses would remain the same as the Project, the configuration of the ground floor commercial uses and residential lobbies for the Senior Buildings would be reconfigured in order to accommodate the parking podiums. The four commercial spaces would be located on the ground floor along: Vine Street in the East Building; Vine Street in the West Building; and Yucca Street and Ivar Avenue in the West Senior Building.

Alternative 6 would be developed with a total of 24,541 square feet of publicly accessible open space at the ground level, as compared to 33,922 square feet of publicly accessible open space under the Project. A paseo extending between Vine Street and Ivar Avenue would be provided on the West Site; however, because of the parking podium on the East Site, the paseo would not extend to Argyle Avenue. As such, the open space plaza on the East Site would only be accessible from Vine Street. In addition, no performance stage would be located within the paseo off of Vine Street on the East Site as the East Building footprint would preclude this Project feature from occurring. **Figure V-14**, *Alternative 6 Ground Floor Plan*, illustrates the uses and open space at the ground level, and **Figure V-15**, *Alternative 6 Building Footprints*, illustrates the location of proposed residential buildings relative to the those of the Project in **Table V-10**, *Comparison of Alternative 6 to the Project*, below.

71 The minor difference in height between the Project's West Building and Alternative 6's West Building is due to the differences in design.



D170105.00

SOURCE: Handel Architects, 2019

Hollywood Center Project

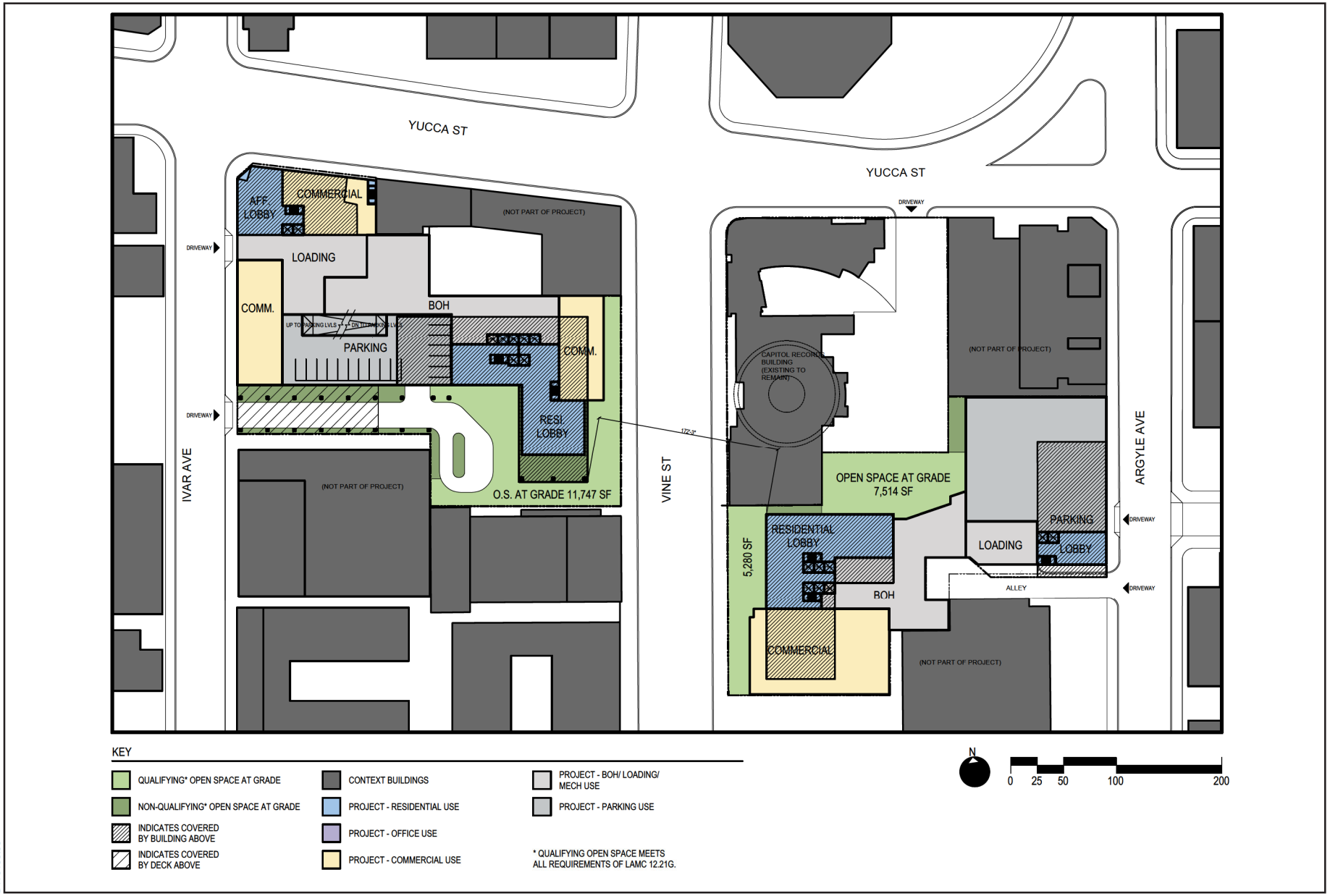
Figure V-13
Building Massing for Alternative 6

D170105.00

SOURCE: Handel Architects, 2020

Hollywood Center Project

Figure V-14
Alternative 6 Ground Floor Plan



D170105.00

SOURCE: Handel Architects, 2020

Hollywood Center Project

Figure V-15
Alternative 6 Building Footprints

TABLE V-10
COMPARISON OF ALTERNATIVE 6 TO THE PROJECT

Component	Project	Project With the East Site Hotel Option	Alternative 6
Publicly Accessible Open Space	33,922 sf	33,922 sf	24,541 sf
East Site	24,990	24,990 sf	12,794 sf
West Site	8,932 sf	8,932 sf	11,747 sf
Maximum Building Height			
East Site	46 stories, 595 feet	46 stories, 595 feet	46 stories, 595 feet
West Site	35 stories, 469 feet	35 stories, 469 feet	35 stories, 469 feet
Market-Rate Units Total	872 du	768 du	872 du
East Site	423 du	319 du	423 du
West Site	449 du	449 du	449 du
Senior Affordable Units Total	133 du	116 du	133 du
East Site	65 du	48 du	65 du
West Site	68 du	68 du	68 du
Hotel	N/A	220 rooms	N/A
Maximum Building Height Senior Buildings			
East Site	11 stories, 149 feet	9 stories, 131 feet	21 stories, 260 feet (10 stories of senior units located above 11-story parking podium)
West Site	11 stories, 155 feet	11 stories, 155 feet	15 stories, 198.5 feet (10 stories of senior units located above five-story parking podium)
Hotel	N/A	220 rooms	N/A
Retail and Restaurant Floor Area Total	30,176 sf	30,176 sf	30,176 sf
East Site	17,485 sf	17,485 sf	17,485 sf
West Site	12,691 sf	12,691 sf	12,691 sf
Total New Floor Area	1,287,150 sf	1,277,741 sf	1,286,634 sf
East Site	638,407 sf	623,997 sf	634,210 sf
West Site	648,793 sf	648,744 sf	652,424 sf
Vehicle Parking	1,521 spaces	1,521 spaces	1,521 spaces
East Site	684 spaces	684 spaces	480 spaces
West Site	837 spaces	837 spaces	1,041 spaces
FAR[a]	6.973:1	6.901:1	6.972:1

[a] The calculated FAR includes new floor area in addition to the floor area of the Capitol Records and Gogerty Buildings (114,303 sf).

SOURCE: ESA, 2020.

(2) Environmental Impacts

(a) Aesthetics

SB 743 (codified in PRC Section 21099(d)(1)) and ZI File No. 2452 provide that a mixed-use or employment center project in a designated TPA site and infill area is not required to evaluate physical aesthetic impacts pertaining to scenic vistas, scenic resources, and light and glare in an EIR. Although the Project and this Alternative meet these criteria, for disclosure purposes only, information based on City thresholds is provided relative to scenic vistas, scenic resources, and light and glare.

As aesthetics impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 6 apply to both the Project and the Project with the East Site Hotel Option.

(i) Scenic Vistas

Alternative 6 would involve the construction of four new residential buildings with retail and restaurant uses incorporated on the ground level. As with the Project, the 46-story East Building would rise to 545 feet at its top story and 595 feet at the top of the bulkhead. However, with the parking podium, the East Senior Building would be 21 stories and would reach a maximum height of 240 feet at its top floor and a height of 260 feet at the top of its bulkhead. Similar to the Project, the 35-story West Building would rise to 429 feet at its top story and 469 feet at the top of the bulkhead would be constructed in the West Site. However, with the parking podium, the West Senior Building would be 15 stories and reach a maximum height of 179 feet at its top story and 198.5 feet at the top of its mechanical bulkhead. Construction and operation of Alternative 6 would affect public views across the existing surface parking lots and views of scenic elements within the Project Site. As with the Project, a construction fence will be erected along the periphery of the Project Site, including Vine Street (required under Project Design Feature AES-PDF-1), which would temporarily block views of the “Hollywood Jazz: 1945-1972” mural. Construction activities would also require the temporary removal of a portion of the Hollywood Walk of Fame. However, construction would be temporary and would not have a permanent substantial adverse effect on views of these features. As with the Project, the West Building would block some passing views of the historic Knickerbocker sign from the Hollywood Freeway. However, similar to the Project, because of the continuous movement of traffic and availability of other freeway views to the sign, the effect on this freeway view is not considered a substantial adverse effect of Alternative 6.

There are no existing significant panoramic views across the Project Site of the historic Hollywood Sign from adjacent streets or other public areas. Public views of broader scenic resources, such as the mountains and the Hollywood Sign

through other street corridors, would continue to be available and would not be affected by construction or operation of Alternative 6.

Public views of broader scenic resources, such as the mountains and any views of the Hollywood Sign through street corridors, would continue to be available. The construction of parking podiums below the East and West Senior Buildings would increase the heights of these buildings and would affect views across the Project Site. The Project's 11-story East Senior Building height would increase in height from approximately 149 feet at the top of the bulkhead to approximately 240 feet at the top of the bulkhead, resulting in an increase of approximately 91 feet; and the 11-story West Senior Building would increase in height from approximately 155 feet at the top of the bulkhead to approximately 198.5 feet to the top of the bulkhead, resulting in an increase of approximately 43.5 feet. The height of the East Senior Building and the adjacent parking podium would block views of the Capitol Records Building from Argyle Avenue. In addition, under Alternative 6, the East Site parking podium would eliminate the paseo entrance along Argyle Avenue. The West Senior Building would be located near the intersection of Ivar Avenue and Yucca Street and block views of the Capitol Records Building that would, otherwise, be available under the Project. A five-story parking podium (approximately 84 feet in height) would be located mid-block on Ivar Avenue, which would further block views across the Project Site from Ivar Avenue. Thus, effects on views of the Capitol Records Building under Alternative 6 would be greater than the Project.

However, similar to the Project, the East Building would be set back from Vine Street and, as such, would facilitate views of the Capitol Records Building from the intersection of Hollywood Boulevard and Vine Street. The Capitol Records Building would continue to be visible from more prominent view locations, such as the Hollywood Hills. The heights of the East Building and West Building would be the essentially same as under the Project, noting that the West Building under Alternative 6 would be 7 feet shorter than the Project due to the difference in design. As with the Project, Alternative 6 would not result in substantial adverse effects on scenic vistas. However, with greater view blockage under Alternative 6 from Argyle Avenue and Ivar Avenue due to the parking podiums, Alternative 6 would have a greater effect on scenic vistas compared to the Project.

(ii) Scenic Resources

Impacts to on-site scenic resources, such as the on-site Capitol Records Building, the "Hollywood Jazz: 1945-1972" mural, the adjacent Hollywood Walk of Fame, and existing street trees, under Alternative 6 would be the same as the Project. Similar to the Project, construction vehicles and other construction activity on or adjacent to the Vine Street sidewalk under Alternative 6 would potentially impact the Hollywood Walk of Fame. However, as with the Project, implementation of Mitigation Measure CUL-MM-1 would ensure protection and temporary removal of

the bronze and terrazzo Hollywood Walk of Fame stars and reduce impacts to less-than-significant. As with the Project, Alternative 6 would replace removed street trees with similar species and plant additional trees within the Project Site's open space areas, including the paseo, in accordance with the requirements of the LAMC and the City's Urban Forestry Division's requirements (currently requiring street tree replacement on a 2:1 basis). In addition, similar to the Project, Alternative 6 would preserve the "Hollywood Jazz: 1945-1972" mural. Overall, similar to the Project, Alternative 6 would not substantially damage scenic resources. As with the Project, Alternative 6 would implement measures to ensure the Hollywood Walk of Fame is protected and that no physical changes to nearby scenic resources or historic buildings would occur. Therefore, when compared to the Project, the effects on scenic resources under Alternative 6 would be similar to the Project.

(iii) Regulations Governing Scenic Quality

CEQA Appendix G addresses whether a project in an urban area would conflict with regulations that govern scenic quality, such as those applicable to street trees, exterior lighting, signage, and compliance with applicable policies of the General Plan or Community Plan. As with the Project, Alternative 6 would replace street trees and provide exterior lighting in compliance with LAMC regulations and would comply with signage regulations set forth under the HSSUD. In addition, similar to the Project, Alternative 6 would not conflict with Objective 7 of the Hollywood Community Plan, which requires the preservation of open space and promotes the preservation of views, natural character and topography of mountainous parts of the Hollywood community. The Project Site is visible from the Mulholland Scenic Parkway's Hollywood Bowl Overlook, an area with broad open space views in the Hollywood Hills. As with the Project, Alternative 6 would not adversely affect views from this open space area and, as such, would be consistent with Objective 7 of the Community Plan to preserve views. Therefore, similar to the Project, Alternative 6 would not conflict with the LAMC, HSSUD, or the applicable Community Plan open space policy. As with the Project, impacts under Alternative 6 would be less than significant. As Alternative 6 would also comply with regulations governing scenic quality, impacts under Alternative 6 would be similar to the Project.

(iv) Light and Glare

As with the Project, Alternative 6 would introduce new lighting, including temporary construction lighting, wayfinding lights, security lighting, landscape lighting, street-level commercial signs, paseo lighting, architectural accent lighting, and interior lighting visible through windows, all of which would be installed pursuant to LAMC lighting requirements. Architectural lighting would be provided at the top of the new buildings, as under the Project. In combination with the Capitol Records Building, any architectural lighting and signage would be consistent with HSSUD policy encouraging illuminated signage to reflect a modern, vibrant image of Hollywood.

However, as with the Project, no still or moving images would be projected onto the buildings. Project Design Feature AES-PDF-3 would ensure that glass used in building façades will be anti-reflective or treated with an anti-reflective coating in order to minimize glare. Project Design Feature AES-PDF-4 would require that construction and operational lighting be shielded and directed downward (or on the specific on-site feature to be lit) in such a manner so as to avoid undue glare or light trespass onto adjacent uses. Similar to the Project, the incorporation of Project Design Features and LAMC requirements in Alternative 6 would ensure that potential light and glare would not adversely affect day or nighttime. Since Alternative 6 would result in the similar maximum building heights and similar overall floor area, although differences in building massing would occur, light and glare effects would be similar to the Project.

(b) Air Quality

Daily air quality construction emissions would be similar under the Project and the Project with the East Site Hotel Option. While the Project and the Project with the East Site Hotel Option would have nominally different daily operational emissions, the impact conclusions, significance levels, and mitigation measures are the same for the Project and the Project with the East Site Hotel Option. Accordingly, the below comparisons of impacts of Alternative 6 apply to both the Project and the Project with the East Site Hotel Option.

(i) Conflict with an Air Quality Management Plan

Similar to the Project, Alternative 6 would include new development on the Project Site that would generate new criteria pollutant emissions. Similar to the Project, Alternative 6 would be consistent with the goals of SCAG's 2016-2040 RTP/SCS and growth projections in the 2016 AQMP, since the growth would occur in a HQTA and a TPA. As with the Project, Alternative 6 would be consistent with the AQMP in its incorporation of appropriate control strategies for emissions reduction during construction and operation. In addition, Alternative 6 would also be consistent with applicable goals, objectives, and policies of the Air Quality Element of the General Plan that support and encourage pedestrian activity in the Hollywood area and uses that contribute to a land use pattern addressing housing needs while reducing vehicle trips and air pollutant emissions within a TPA. For all of these reasons, impacts under Alternative 6 with respect to consistency with air quality management plans would be less than significant and similar to the Project.

(ii) Cumulative Increase in Criteria Pollutants/Violation of Air Quality Standards

(a) Construction

As with the Project, Alternative 6's construction phases have the potential to generate emissions that would exceed SCAQMD air quality standards through the use of heavy-duty construction equipment, construction traffic, fugitive dust

emissions, paving operation, and the application of architectural coatings and other building materials. The maximum daily emissions under Alternative 6 would be less the Project because it would avoid the Project's excavation phase and associated soil export hauling, which is the most intensive phase of construction producing the highest levels of emissions. Similar to the Project, with incorporation of Mitigation Measure AQ-MM-1 which would require the use of diesel-powered construction equipment that meet USEPA Tier 4 Final off-road emissions standards; use of pole electricity or alternative energy to power electric tools, equipment, and lighting; maintenance and operation of construction equipment to minimize exhaust emissions; and incorporation of Project Design Feature GHG-PDF-1 (Green Building Features), construction emissions under Alternative 6 would not exceed SCAQMD numerical significance thresholds. Similar to the Project, because Alternative 6's construction emission levels would be below the applicable numerical significance thresholds, emissions related to air quality standards would be less than significant. However, because Alternative 6 would avoid the Project's excavation and hauling phase for the development of subterranean levels, it would reduce the Project's construction duration and extent of overall activities. As Alternative 6 would reduce construction duration and extent of overall activities, impacts with respect to cumulative increases in criteria pollutants and violations of air quality standards would be less than the Project.

(b) Operation

During operation, Alternative 6 would generate emissions associated with vehicle trips, heating, lighting, other electric and natural gas power requirements, emergency generators, and architectural coatings. Alternative 6 would incorporate Project Design Feature GHG-PDF-1 (Green Building Features) and would comply with SCAQMD Rule 1113 regarding architectural coatings.

Mobile sources emissions would be reduced compared to the Project due to the reduction in vehicle trips and VMT under Alternative 6. This reduction is because Alternative 6 would not include a performance stage in the paseo within the East Site near the "Hollywood Jazz: 1945-1972" mural, which was assigned daily trips under the Project. Alternative 6 would generate approximately 3,746 trips per day and 24,394 daily VMT, compared to 3,865 trips per day and 24,394 under the Project and 4,504 trips per day and 28,810 under the Project with the East Site Hotel Option. The difference in vehicle trips is due to Alternative 6's slightly lower level activity in its publicly accessible open space, in particular, Alternative 6 would not include a performance in the paseo within the East Site.

NOx emissions would be 76 and 79 pounds per day for the Project and the Project with the East Site Hotel Option, respectively. The daily impact threshold for NOx is 55 pounds per day. Despite the incremental reduction in traffic under Alternative 6, daily operational NOx emission exceedances would occur under Alternative 6 as it would have a similar development program as the Project, and its collective NOx generating sources are expected to be above 55 pounds per day. Alternative

6 would implement the same Mitigation Measure AQ-MM-2 as the Project to reduce operational NOx levels to a less-than-significant level.

As Alternative 6 would have less traffic than the Project, its operational daily emissions would not exceed the SCAQMD numerical significance thresholds for VOC, CO, SOx, PM10 and PM2.5. Thus, as with the Project, impacts would be less than significant under Alternative 6 for these criteria pollutants. However, because of its reduced emissions, impacts under Alternative 6 with respect to cumulative increases in criteria pollutants and violations of air quality standards would be less than Project.

(iii) Exposure of Sensitive Receptors to Pollutant Concentrations

(a) Localized Emissions

Alternative 6 would generate localized emissions during construction and operation. It can be expected that maximum daily localized construction emissions would be less than the Project since it would avoid the Project's excavation phase and associated soil export hauling, which is the most intensive phase of construction producing the highest levels of emissions. As with the Project, maximum localized emissions associated with grading and architectural coatings during construction and charbroilers, landscaping, coatings, and use of consumer products, and other sources at sensitive receptors would be below the localized screening thresholds for NO_X, CO, PM10, and PM2.5, including at the nearest receptors adjacent to the Project Site. Therefore, similar to the Project, with respect to localized construction and operational emissions, impacts to sensitive receptors would be less than significant under Alternative 6. However, because Alternative 6 would avoid the Project's excavation and hauling phase associated with the development of subterranean levels, impacts with respect to localized emissions would be less than the Project.

(b) Carbon Monoxide Hotspots

Daily vehicle trips would be less under Alternative 6 than the Project as it would not include a performance stage within the paseo on the East Site, which was assigned daily trips under the Project. As such, similar to the Project, Alternative 6 would not cause or contribute considerably to the formation of CO hotspots and impacts would be less than significant. However, because Alternative 6 would reduce the Project's daily vehicle trips and VMT, impacts would be less than the Project.

(c) Toxic Air Contaminants

(i) Construction

Under Alternative 6, as with the Project, temporary TAC emissions associated with DPM emissions from heavy construction equipment would occur during

construction activities. Mitigation Measure AQ-MM-1 would require utilization of off-road diesel-powered construction equipment that meets or exceeds the most stringent and environmentally protective CARB and USEPA Tier 4 off-road emissions standards. The Tier 4 standards would reduce DPM emissions by approximately 81 to 96 percent compared to equipment that meet the Tier 2 off-road emissions standards. Similar to the Project, with implementation of the required mitigation, Alternative 6 would not expose sensitive receptors to substantial TAC concentrations and impacts would be less than significant. However, because Alternative 6 would eliminate the need for excavation and would reduce hauling, it would reduce the scale and duration of construction activities, impacts under Alternative 6 would be less than the Project.

(ii) Operation

Alternative 6, as with the Project, would use consumer products and architectural coatings or involve other sources, such as charbroiling associated with restaurant uses. TAC emissions from these sources are anticipated to be minimal and all restaurant emissions would be regulated under SCAQMD Rule 1138. In addition, Alternative 6 would provide stationary emergency generators in the residential buildings. The emergency generators would result in emissions during maintenance and testing operations. Emergency generators are permitted by the SCAQMD and regulated under SCAQMD Rule 1470. Maintenance and testing would occur periodically, up to 50 hours per year per Rule 1470. As with the Project, Alternative 6's land uses would not include installation of industrial-sized paint booths or require extensive use of commercial or household cleaning products. Alternative 6 would generate only minor amounts of diesel emissions from mobile sources (non-on-site construction vehicles), such as delivery trucks that would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. Furthermore, trucks would be required to comply with the applicable provisions of the CARB 13 CCR, Section 2025 (Truck and Bus regulation) to minimize and reduce PM and NO_X emissions from existing diesel trucks. As a result, toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the uses expected on the Project Site, which would be same as the Project, potential long-term operational impacts associated with the release of TACs under Alternative 6 would be minimal, regulated, and controlled, and would not be expected to exceed the applicable SCAQMD numerical significance thresholds. Operation of Alternative 6 as with the Project, would not expose sensitive receptors to substantial TAC concentrations, and operational impacts would be less than significant. Also because of the similarity in scale and occupancy to the Project, impacts under Alternative 6 would be similar to the Project.

(d) Other Emissions Affecting a Substantial Number of People

Activities under Alternative 6 would potentially generate other emissions, such as those leading to odors. These may include the use of architectural coatings and solvents, as well as the combustion of diesel fuel in on-and off-road equipment. SCAQMD Rule 1113 would limit the amount of VOCs in architectural coatings and solvents. In addition, Alternative 6 would comply with the applicable provisions of the CARB Air Toxics Control Measure regarding idling limitations for diesel trucks. Through mandatory compliance with SCAQMD rules, construction activities and materials are not expected to result in emissions that would create objectionable odors affecting a substantial number of people. Operation of Alternative 6 would not involve land uses typically associated with odor complaints, such as agricultural uses or food processing plants, or any uses identified by the SCAQMD as being associated with substantial odors. As with the Project, Alternative 6 is not expected to discharge contaminants into the air in quantities that would cause a nuisance, injury, or annoyance to the public or property pursuant to SCAQMD Rule 402. Therefore, as with the Project, odor and other emissions impacts under Alternative 6 would be less than significant. Accordingly, impacts with respect to other emissions under Alternative 6 would be similar to the Project.

(c) Cultural Resources

As cultural resources impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 6 apply to both the Project and the Project with the East Site Hotel Option.

(i) Historical Resources

As with the Project, Alternative 6 would not demolish or cause an adverse material change in the eligibility of any historical resources within the Project Site due to direct impacts. However, as with the Project, maximum building heights under Alternative 6, or (46 stories and 35 stories on the East Site and West Site, respectively) would alter the larger setting of the area and, potentially, the historic setting of the Hollywood Boulevard Historic District. In addition, Alternative 6 would increase the heights of the East and West Senior Buildings equivalent to 21- and 15-story buildings, respectively. However, as with the Project, potential indirect impacts associated with this contrast under Alternative 6 would be less than significant and similar to the Project.

As with the Project, Alternative 6 would also result in temporary alterations to the Hollywood Walk of Fame and potentially significant and unavoidable impacts due to structural vibration at nearby historical resources during construction. As with the Project, impacts associated with Alternative 6 could be reduced to less-than-significant with implementation of Mitigation Measures CUL-MM-1, CUL-MM-2, and NOI-MM-4. As with the Project, the mitigation available for Alternative 6 would avoid significant impacts on the Capitol Records Building and Gogerty Building and

would provide similar protections to the other proximate historical buildings subject to potential structural damage from vibration, as follows: the Pantages Theatre, Avalon Hollywood, and the building located at 6316-24 Yucca Street/Art Deco Storefront. However, because Mitigation Measure CUL-MM-2 and Mitigation Measure NOI-MM-4 require the consent of other property owners, who may not agree to participate in their implementation, it is conservatively concluded that structural vibration and settlement impacts on proximate historical resources would remain significant and unavoidable after implementation of mitigation measures. Nonetheless, because Alternative 6 would eliminate the Project's excavation and hauling phase necessary for the development of subterranean garages, it would reduce the duration of the Project's construction activity. Therefore, although impacts would remain significant and unavoidable, vibration impacts on historical resources under Alternative 6 would be less than the Project.

(ii) Archaeological Resources

Alternative 6 would avoid the excavation needed for the development of the Project's subterranean garages, and, compared to the Project with maximum excavation depths of approximately 64 feet on the East and West Sites, it would substantially reduce the extent of excavation into the historic fill layer, as well as previously undisturbed native soils. Nonetheless, excavation would still be required for building foundations and other structures/infrastructure and would still extend into the historic fill layer and undisturbed native soils with the potential to encounter prehistoric and/or historic archaeological resources. Alternative 6, as with the Project, would implement Mitigation Measures CUL-MM-3 through CUL-MM-5. With the implementation of these measures, Alternative 6, as with the Project, would provide for appropriate treatment and/or preservation of resources if encountered. Under Alternative 6, as with the Project, potentially significant impacts to archaeological resources would be mitigated to a less-than-significant level. However, because Alternative 6 would avoid excavation for subterranean parking, impacts related to archaeological resources would be less than the Project.

(iii) Human Remains

Alternative 6 would avoid the excavation needed for the development of the Project's subterranean garages. However, the potential exists for any construction and grading activity to uncover human remains. Pursuant to California Health and Safety Code Section 7050.5, Public Resources Code 5097.98, and California Code of Regulations Section 15604.5(e), any discovery of unrecorded human remains would require the immediate halting of construction or ground-disturbing activities and notification of the County Coroner. If the remains are determined to be Native American in origin, a "Most Likely Descendent" would be contacted to assist in determining appropriate treatment for the remains. In the event of the discovery of unrecorded human remains during construction, compliance with applicable regulatory requirements would ensure potential impacts are less than significant. Thus, Alternative 6, as with the Project, would have a less-than-

significant impact with respect to human remains. However, because the potential to encounter human remains would be less under Alternative 6 due to significantly less excavation, impacts with respect to human remains would be less than the Project.

(d) Geology and Soils

As geology and soils impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 6 apply to both the Project and the Project with the East Site Hotel Option.

(i) Seismic Hazards

The Project Site is located within the designated Alquist-Priolo Earthquake Fault Zone for the Hollywood Fault; however, underlying soil horizons indicate the Project Site has not experienced fault movement for at least 120,000 years and active faulting does not occur beneath the Project Site. Alternative 6 would avoid the excavation needed for the development of the Project's subterranean garages. Alternative 6 would need, however, to remove loose sand deposit and require suitable engineered stabilization in accordance with applicable City and CBC building regulations. The Project Site is not located within a designated landslide area, and the potential for landslide and seismically induced slope instability at the Project Site is considered to be low. As with the Project, Alternative 6's application of appropriate engineering controls and compliance with regulations for foundation construction would minimize any potential site stability geologic hazards at the Project Site. Therefore, development of Alternative 6, as with the Project, would not result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury caused in whole or in part by exacerbation of existing environmental conditions. As with the Project, impacts related to geologic conditions under Alternative 6 would be less than significant through proper engineering methods and compliance with City and CBC building regulations. With implementation of building regulations and recommendations of applicable final geotechnical reports, impacts with respect to seismic hazards under Alternative 6 would be similar to the Project.

(ii) Soil Erosion or Loss of Topsoil

Although Alternative 6 would avoid excavation for subterranean parking, excavation would still be required for building foundations. However, Alternative 6 would reduce soil exposure and risk of soil erosion compared to the Project. As with the Project, the potential for water erosion under Alternative 6 would be reduced by the implementation of standard erosion control measures during site preparation and grading activities. Construction activities would be carried out in accordance with applicable City standard erosion control practices required pursuant to the CBC and the requirements of the NPDES Construction General Permit issued by the LARWQCB, as applicable. In accordance with these requirements, a SWPPP would be prepared that incorporates BMPs to control

water erosion during the construction period. Following construction, the Project Site would be covered completely by paving, structures, and landscaping, which would not leave any exposed areas of bare soil susceptible to erosion. Thus, similar to the Project, impacts due to erosion of topsoil would be less than significant under Alternative 6. Alternative 6, like the Project, would comply with CBC building regulations and implement a SWPPP and BMPs and, as with the Project, would result in less than significant soil erosion impacts. However, because Alternative 6 would entail minimal excavation, impacts related to soil erosion would be less than the Project.

(iii) Unstable Geologic Units

Alternative 6 would avoid excavation for subterranean parking. As such, the need for shoring and other building requirements under the Project would be reduced. However, as with the Project, excavation and shoring would comply with applicable provisions of the CBC to minimize the potential for site stability hazards during temporary excavation activities. As with the Project, Alternative 6 would not be located on an unstable geologic unit. In addition, Alternative 6 would comply with CBC requirements and, prior to issuance of a grading permit, a qualified geotechnical engineer must prepare and submit to the LADBS a Final Geotechnical Report that includes site-specific design recommendations for seismic safety and design requirements for foundations, retaining walls/shoring and excavation to meet applicable State and City code and regulations. As with the Project, through adherence to the CBC and the recommendations of the Final Geotechnical Report, impacts with respect to geologic units under Alternative 6 would be less than significant. However, because total earthwork would be significantly reduced, impacts related to unstable geologic units would be less than Project.

(iv) Expansive Soils

Similar to the Project, Alternative 6 would encounter and remove near surface soils that have a low to medium potential for expansion during excavation activities. In addition, expansive soil hazards would be further evaluated for the Project Site as part of the LADBS approved Final Geotechnical Report that would include site-specific design recommendations for addressing expansive soils, as needed. Further, as with the Project, compliance with standard construction and engineering practices, and proper engineering erosion control and drainage design would ensure that hazards associated with potential expansive soils or corrosive soils are properly addressed. As such, as with the Project, impacts related to expansive soils or corrosive soils under Alternative 6 would be less than significant and similar to the Project.

(v) Paleontological Resources

Although Alternative 6 would avoid the Project's excavation for subterranean parking, earthwork would still be required for the development of building foundations. As such, Alternative 6, as with the Project, could access high

sensitivity alluvial sediments. This classification indicates a high potential for fossils to be present in the subsurface. Similar to the Project, implementation of Mitigation Measures GEO-MM-1 through GEO-MM-3 under Alternative 6 would provide for appropriate treatment and/or preservation of resources and would mitigate impacts to paleontological resources to less-than-significant. However, because excavation and excavation depths would be less under Alternative 6, impacts related to paleontological resources would be less than the Project.

(e) Greenhouse Gas Emissions

Despite the Project and the Project with the East Site Hotel Option having slightly different overall GHG emissions, because impact conclusions and significance levels related to GHG emissions would be the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 6 apply to both the Project and the Project with the East Site Hotel Option.

The construction and occupancy of the Project Site under Alternative 6, as with the Project, would increase GHG emissions. As with the Project, Alternative 6 would incorporate GHG reduction characteristics, features, and measures. Although the State and City have not established quantitative values for GHG emissions, in order to comply with policies and regulations adopted for the purpose of reducing or mitigating GHG emissions, Alternative 6, as with the Project, would incorporate AQ-PDF-1, AQ-PDF-2 and GHG-PDF-1. Alternative 6 would include the same development program as the Project but would result in slightly less daily trips and VMT. The difference in vehicle trips is due to Alternative 6's slightly lower level activity in its publicly accessible open space; in particular, Alternative 6 would not include a performance in the paseo within the East Site. Accordingly, the lower mobile emissions associated with Alternative 6 would generate lower GHG emissions than the Project's maximum GHG operational emissions. With incorporation of applicable Project Design Features, GHG emission impacts under Alternative 6, as with the Project, would be less than significant. Due to its lower GHG operational emissions, impacts under Alternative 6 with respect to GHG emissions on the environment would be less than the Project.

Alternative 6, as with the Project, with incorporation of AQ-PDF-1, AQ-PDF-2 and GHG-PDF-1 would be consistent with applicable strategies outlined in CARB's Climate Change Scoping Plan, SCAG's 2016-2040 RTP/SCS, Sustainable City pLAn, and the City's Green Building Code. As such, similar to the Project, impacts related to conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs would be less than significant under Alternative 6. As discussed under the Transportation subsection, below, Alternative 6 would result in a household per capita VMT of 4.8 and is exempt from a retail VMT per capita finding, while the Project would result in a 4.8 household VMT is exempt from a retail VMT per capita finding. The Project with the East Site Hotel Option would result in a 4.7 household per capita VMT and 4.8 work VMT

per employee. As such, because Alternative 6 would result in the same household VMT per capita rate as the Project and would not conflict with applicable GHG plans, impacts under Alternative 6 with respect to conflicts with GHG plans adopted for the purpose of reducing the emissions of GHGs would be less than significant and similar to the Project.

(f) Hazards and Hazardous Materials

As impacts related to hazards and hazardous materials would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 6 apply to both the Project and the Project with the East Site Hotel Option.

(i) Hazards to the Public or Environment through the Routine Transport, Use, or Disposal of Hazardous Materials

Construction of Alternative 6, as with the Project, would include demolition of existing parking surfaces and structures other than the Capitol Records Complex. Construction equipment and materials, such as fuels, oils and lubricants, solvents and cleaners, adhesives, paints and thinners, degreasers, cement and concrete, and asphalt mixtures, which are all commonly used in construction, would be used, stored, and disposed of in consumer quantities and in accordance with applicable laws and regulations and manufacturers' instructions. As with the Project, operation of Alternative 6 would involve the limited use of potentially hazardous materials typical of those used in residences, offices, hotels and restaurants, including cleaning agents, paints, pesticides, and other materials used for landscaping. In addition, hazardous materials on the Project Site would continue to be acquired, handled, used, stored, and disposed of in accordance with all manufacturers' specifications and all applicable federal, State, and local requirements. Compliance with all applicable regulations concerning the transport, use, and disposal of hazardous waste under Alternative 6, as with the Project, would reduce hazardous materials impacts to a less-than-significant level. As the scale and occupancy of Alternative 6 is similar to the Project, impacts with respect to the routine transport, use and disposal of hazardous materials would be similar.

(ii) Hazard to the Public or Environment Involving the Accidental Release of Hazardous Materials into the Environment

Alternative 6 would require earthwork for building foundations but would avoid the Project's excavation of subterranean levels. All excavations and foundation development could expose the public or the environment to contaminated soils and soil vapors and could reveal remnant steel structures and/or possibly USTs associated with historic automobile gas and service stations. Alternative 6, as with the Project, would implement Mitigation Measure HAZ-MM-1 (Soil Management Plan) and establish policy and requirements for the disposal of contaminated soils

and management of soil vapors or other gases during excavation activities. Similar to the Project, impacts under Alternative 6 related to the accidental release of hazardous materials during construction would be less than significant after mitigation. While Alternative 6 would not include excavation for any subterranean levels, it would still require removal of existing surface parking areas and grading and excavations for building footings. These construction activities could encounter contaminated soils and soil vapors which would be fully addressed by the Soils Management Plan. Despite the decrease in excavation, as with the Project, the Soils Management Plan would ensure no significant hazards to the public or environment occur under Alternative 6 and impacts would be less than significant after mitigation. Nonetheless, because the extent of excavation would be substantially less, impacts under Alternative 6 would be less than the Project.

(iii) Hazard Resulting from Hazardous or Acutely Hazardous Materials, Substances, or Waste within One-Quarter Mile of a School

Alternative 6, as with the Project, is not located within one-quarter mile of a school. Similar to the Project, Alternative 6 would implement Mitigation Measure HAZ-MM-1 (Soil Management Plan), which would establish policy and requirements during construction for the disposal of contaminated soils and management of soil vapors or other gases during excavation activities. Also, similar to the Project, Mitigation Measure AQ-MM-1 would be implemented under Alternative 6 requiring the use of Tier IV construction equipment to minimize TAC emissions. In addition, during operation Alternative 6 would not require the handling of acutely hazardous materials or result in the emission of hazardous materials other than, potentially, VOCs. associated with diesel vehicles and consumer products (e.g., architectural coatings, household cleaners, landscaping fertilizers and pesticides, etc.). Alternative 6, as with the Project, during operation would only require the limited use of potentially hazardous materials associated with domestic maintenance and landscaping. In addition, Alternative 6 would comply with applicable local, State, and Federal laws and regulations relating to the use of hazardous or acutely hazardous materials. Therefore, as with the Project, impacts related to the use of hazardous or acutely hazardous materials within a quarter mile of a school under Alternative 6 would be less than significant and similar to the Project.

(iv) Hazardous Materials Sites

Alternative 6, similar to the Project, would not involve construction or alter existing activities on a hazardous materials site compiled pursuant to Government Code Section 65962.5. Accordingly, Alternative 6 and the Project would have no impact with regard to development occurring on a hazardous materials site. Thus, impacts related to development on a hazardous materials site under Alternative 6 would be similar to the Project.

(v) Emergency Response Plan/Emergency Evacuation Plan

Alternative 6, as with the Project, would involve new construction and increased traffic. Alternative 6, as with the Project, would not however, affect the City's Emergency Operations Plan or established disaster evacuation routes, the nearest of which are Santa Monica Boulevard approximately 0.8 miles to the south and Highland Avenue approximately 0.6 miles to the west. As with the Project, Alternative 6 would not require any policy or procedural changes to the City of Los Angeles Emergency Operations Plan or the City's established disaster routes. Also, during an unanticipated disaster event, the LAPD and LAFD would implement operational protocols, as well as plans and programs, on a case-by-case basis, to facilitate emergency evacuations and/or response, which would consider traffic conditions at the time of the emergency. In such instances, traffic would be routed along the City's numerous disaster routes, as determined appropriate by the responding City agencies. Similar to the Project, construction and operation of Alternative 6 would not close any existing streets or otherwise represent a significant impediment to emergency response or evacuation of the local area. Construction of Alternative 6, as with the Project, would occur within the boundaries of the Project Site and within the rights-of-way of adjacent streets, including the median within Vine Street and signal installation along Argyle Avenue. Temporary partial lane closures are not anticipated to significantly affect the circulation of emergency vehicles, which normally have a variety of options for dealing with traffic and congestion, such as sirens, priority use of the roadway, and use of alternate routing. In addition, Alternative 6, as with the Project, would implement Project Design Feature TRAF-PDF-2, which requires preparation of a Construction Traffic Management Plan and includes street closure information, a detour plan, haul routes, and a staging plan. The Construction Traffic Management Plan will be submitted to the City for review and approval. With Project Design Feature TRAF-PDF-2, construction of Alternative 6, like the Project, would not substantially impede public access, create severe consequences for emergency response vehicles, substantially impede travel upon a public right-of-way, or interfere with an adopted emergency response or evacuation plan. During operation, Alternative 6, as with the Project, would be required to establish, implement, and maintain an emergency response plan. The emergency response plan, which would be submitted to the LAFD for inspection and approval prior to implementation, would be inspected annually by the LAFD and include evacuation procedures. In addition, the California Fire Code, Chapter 10, Means of Egress, requires that all habitable structures comply with the California Fire Code, including providing ingress and egress during emergencies. As with the Project, compliance with existing regulations would ensure that an adequate emergency response plan is established for Alternative 6. Overall, as with the Project, impacts under Alternative 6 with respect to conflicts with or interfering with emergency response or evacuation plans would be less than significant. However, because Alternative 6 would generate less traffic and result in lower pedestrian occupancy than the

Project, impacts with regard to emergency response would be less than the Project.

(g) Hydrology and Water Quality

As hydrology and water quality impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of the Alternative 6 apply to both the Project and the Project with the East Site Hotel Option.

(i) Water Quality

(a) Construction

Alternative 6, as with the Project, would include construction activities, including earth moving, maintenance/operation of construction equipment, potential dewatering, and handling/storage/disposal of materials, that could contribute to pollutant loading in stormwater runoff from the construction site. Also, wind could convey exposed and stockpiled soils at the construction site into nearby storm drains during storm events, and on-site water activities for dust suppression purposes could contribute to pollutant loading in runoff from the construction site. Although Alternative 6 would require some encroachment into subterranean layers for foundation construction, it would not require excavation for subterranean garages unlike the Project. Groundwater depths range from less than 49.2 bgs to approximately 98.3 feet bgs across the Project Site. Thus, Alternative 6 would not encounter groundwater during construction, while the Project's excavation could encounter groundwater. Accordingly, Alternative 6 would avoid the Project's potential impacts to groundwater during construction. The potential impact related to pollutant loading or groundwater quality that would cause exceedances of water quality standards, through compliance with regulatory requirements, BMPs, and Building Code grading procedures under Alternative 6 and the Project, would be less than significant. However, because of the reduced scale and depth of excavation under Alternative 6, the potential exposure of excavated soils to the elements and encroachment into the water table would be less than the Project.

(b) Operation

Alternative 6, as with the Project, would incorporate a drainage collection and conveyance system that would detain and treat/filter runoff in compliance with the City's LID Manual requirements to reduce the quantity of, and improve the quality of, rainfall runoff leaving the Project Site. With the implementation of such system and BMPs, Alternative 6, as with the Project, would result in an improvement in the quality of stormwater runoff from the Project Site compared to existing conditions. As with the Project, impacts related to water quality standards under Alternative 6 would be less than significant, and would be similar to the Project.

(ii) Decreases in Groundwater Supplies or Recharge

Alternative 6, as with the Project, would not require groundwater withdrawal. However, excavation for the foundations is not expected to encounter groundwater.

Under Alternative 6, as with the Project, the coverage of the Project Site with building foundations and paving, and underlying storm drain system to collect and treat stormwater, would not result in a material change in the amount of stormwater that would percolate into the groundwater table compared to existing conditions. Therefore, similar to the Project, pre- and post-Project infiltration volumes are considered effectively equivalent under Alternative 6 and the Project. Accordingly, similar to the Project, there would not be a substantial reduction in groundwater recharge from current conditions, and Alternative 6 would not introduce activities that could impede sustainable groundwater management of the basin.

Overall, neither Alternative 6 nor the Project would cause substantial depletion of groundwater supplies or substantially interfere with groundwater recharge. Therefore, the impact regarding groundwater recharge or depletion under Alternative 6 would be less than significant and similar to the Project.

(iii) Alteration of Drainage Pattern

(a) Construction

Alternative 6, as with the Project, would include construction activities that could contribute to erosion or siltation if soils are exposed during development of the Project Site. As Alternative 6 would not require excavation for subterranean garages, it would require substantially less excavation and export of materials compared to the Project. Similar to the Project, Alternative 6 would cause a temporary increase in permeable surfaces during construction that would reduce, rather than increase, off-site runoff from the Project Site during a portion of the construction. As with the Project, construction BMPs to manage runoff flows and avoid on- or off-site flooding, would be implemented under Alternative 6. As with the Project, the BMPs would reduce runoff that would potentially create or contribute runoff water exceeding the capacity of existing or planned stormwater drainage systems under Alternative 6. Although the duration of construction activities would be less under Alternative 6 than the Project, the maximum off-site flow under Alternative 6 would be similar, and the impact regarding stormwater drainage system capacity would be similar to the Project. With implementation of BMPs, impacts with respect to surface runoff, siltation, rates of runoff and capacity of drainage systems under Alternative 6, as with the Project, would be less than significant. However, because excavation volumes would be substantially less under Alternative 6 than the Project, the potential impact associated with alteration of a drainage pattern resulting in erosion or siltation during construction would be less than the Project.

(b) Operation

Alternative 6, as with the Project, would largely maintain existing drainage patterns at the Project Site. As with the Project, Alternative 6 would include a drainage system that meets City stormwater retention, treatment and runoff requirements, including all applicable LID requirements. Additionally, under Alternative 6, as with the Project, a reduced peak flow rate of stormwater runoff from the Project Site would occur due to the retention afforded by the proposed LID system and LID BMPs. As site coverage and the proposed stormwater retention system under Alternative 6 are similar to the Project, the volume of stormwater runoff from the Project Site requiring conveyance by the existing off-site storm drain system would decrease to the same extent under Alternative 6 as with the Project. Therefore, impacts under Alternative 6 would be less than significant and similar to the Project.

(iv) Pollutant Release in Flood Hazard, Tsunami, or Seiche Zones

The Project Site is not located within a 100-year floodplain and is not in a tsunami zone and would not be subject to such flooding hazards. The Project Site is located approximately one mile from the Hollywood Reservoir. Given the distance to the Hollywood Reservoir, any oscillation and subsequent release of water within the reservoir as part of a seiche would not inundate the Project Site. Thus, there would be no potential for risk of release of pollutants due to inundation by seiche.

The Project Site is located within the Hollywood Reservoir inundation area.[72] In compliance with applicable regulatory requirements, Alternative 6, as with the Project, would implement BMPs to minimize pollutants within the Project Site during construction. Post-construction, the nature of pollutants would be typical of other developed sites within the dam inundation area. Dam safety regulations executed by the California Department of Water Resources and other agencies are the primary means of reducing damage or injury due to inundation occurring from dam failure, and reduce the likelihood of inundation. Regarding pollutant release, because Alternative 6, as with the Project, would actively maintain a stormwater management system and would be entirely developed with enclosed parking, buildings, and established landscaping, the exposure of flood waters to pollutants would be minimized. Thus, in the unlikely event of on-site inundation, Alternative 6, like the Project, would not result in the release of significant types or quantities of pollutants. As with the Project, impacts with respect to a significant risk of release of pollutants to inundation by flooding, tsunami, or seiche under Alternative 6 would be less than significant and similar to the Project.

72 California Department of Water Resources, Division of Safety of Dams, Dam Inundation Map for Mulholland Dam, https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2, accessed March 15, 2020.

(v) Implementation of Water Quality Control Plans

Alternative 6, as with the Project, would incorporate into its design an on-site drainage system that would be consistent with water quality control plans, the policies of which are expressed in City and State water quality regulations for the protection of water resources. Alternative 6, as with the Project, falls within the jurisdiction of water quality plan regulations that assure that development projects are in compliance with clean water policies. These plans and regulations include the LARWQB (Region 4) Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties; and the NPDES stormwater permitting program. In compliance with the City's LID requirements, Alternative 6, as with the Project, would install a capture and reuse system on each site. The detention would temporarily store the captured stormwater until the stored volume is entirely used through the irrigation system. The on-site drainage system would also provide BMPs in accordance with the City's LID requirements. As with the Project, impacts related to water quality control plans under Alternative 6 would be less than significant and similar to the Project.

(h) Land Use and Planning

As land use impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of the Alternative 6 apply to both the Project and the Project with the East Site Hotel Option.

Alternative 6 proposes up to 1,286,634 square feet of floor area with an approximate FAR of 6.972:1 and 24,541 square feet of publicly accessible open space. The Project proposes up to 1,287,150 square feet of residential and commercial floor area with an approximate FAR of 6.973:1.[73] As with the Project, to allow for development of Alternative 6, the zoning would be amended to C2-2-SN to eliminate the D Limitation, which limits FAR to 3:1 and 2:1 on certain parcels. As with the Project, Alternative 6 would require a Conditional Use Permit to allow FAR averaging to be calculated as a whole rather than by individual parcel or lot and for a residential density transfer between the West Site and East Site. As with the Project, Alternative 6 would not conflict with applicable 2016-2040 RTP/SCS goals to facilitate land use patterns that link land use and sustainable transportation options or the Framework Element Regional Center designation and policies that support a diversity of land uses, and provide for the spatial distribution of development that promotes a reduction of vehicle trips, VMT, and air pollution. Overall, similar to the Project, the density and location of Alternative 6 would not conflict with policies of local and regional land use plans adopted to avoid or mitigate environmental effects, and, as such, impacts with respect to land use

73 The Project with the East Site Hotel Option would provide 1,277,741 square feet of total floor area.

would be less than significant. Impacts in relation to existing plans that avoid or reduce environmental impacts under Alternative 6 would be similar to the Project.

(i) Noise

Maximum daily construction noise and vibration levels would be similar under the Project and the Project with the East Site Hotel Option. While the Project and the Project with the East Site Hotel Option would have nominally different daily operational mobile source noise levels, the impact conclusions, significance levels, and mitigation measures are the same for the Project and the Project with the East Site Hotel Option. Accordingly, the below comparisons of impacts of the Alternative 6 apply to both the Project and the Project with the East Site Hotel Option.

(i) Noise Levels in Excess of Standards

(a) Construction

Alternative 6's buildings and parking podiums would be constructed at grade and no excavation outside of site preparation and foundation construction would be required. As such, Alternative 6 would reduce the duration of construction activity associated with excavation and hauling required under the Project. Similar to the Project, maximum construction activities under Alternative 6 would increase noise levels at several sensitive receptor locations in the area. As with the Project, because the maximum amount of construction equipment operating simultaneously within the Project Site would be constrained by the size of the property, the maximum construction noise levels under Alternative 6 would be similar to the Project. Based on a conservative impact analysis, in which noise levels were calculated with all pieces of construction equipment operating simultaneously and located at the construction area nearest to the affected receptors, construction noise levels would exceed the applicable noise significance thresholds at several nearby noise sensitive receptors. Therefore, as with the Project, Alternative 6 would implement Mitigation Measures NOI-MM-1 to NOI-MM-3 to reduce construction noise impacts at off-site noise sensitive receptors to the extent technically feasible. However, as with the Project, with implementation of technically feasible mitigation, construction noise impacts at noise-sensitive receptors 1, 3, and 5 through 13 (eleven sites) would still exceed the significance threshold under Alternative 6. Therefore, as with the Project, construction noise impacts associated with on-site noise sources would remain temporarily significant and unavoidable for Alternative 6. Similar to the Project, maximum construction traffic, which would be higher under the Project during hauling of export soil, would not result in significant noise levels (greater than 5 dBA L_{eq}) compared to existing traffic noise levels along any of the studied roadway segments. Although construction noise levels associated with on-site noise sources would be significant and unavoidable under Alternative 6, Alternative 6 would require substantially less excavation and scale of development. Therefore, the duration of construction noise exceedance levels would be shorter. As such,

impacts related to construction noise under Alternative 6 would be less than the Project.

(b) Operation

Alternative 6, as with the Project, would increase off-site traffic and generate on-site composite noise associated with fixed equipment, vehicle activity, and human outdoor activity. Alternative 6 would have the same development program in terms of residential and commercial uses. However, Alternative 6 would have a lower level activity in its publicly accessible open space sine Alternative 6 would not include a performance stage in the paseo within the East Site. Due to the decrease in paseo and performance activity, Alternative 6 would generate approximately 3,746 trips per day and 24,394 daily VMT, compared to 3,865 trips per day and 24,394 under the Project and 4,504 trips per day and 28,810 under the Project with the East Site Hotel Option. It is acknowledged that differences in off-site mobile source noise level increases along the studied roadway segments under the Project and the Project with the East Site Hotel Option would be negligible and less than 0.1 dBA CNEL for all analyzed roadway segments. Thus, the difference in mobile source noise levels under Alternative 6 compared to the Project would also be less than 0.1 dBA CNEL, or no difference, along all the analyzed roadway segments.

Under Alternative 6, without a performance stage near the “Hollywood Jazz: 1945-1972” mural, performance related noise from this area of the paseo would not occur. However, similar to the Project, any outdoor performances under Alternative 6 within the paseo would be subject the noise restrictions in NOI-PDF-3, which would limit noise levels from adversely affecting nearby noise sensitive receptors. Thus, noise, in general, generated from the paseo under Alternative 6 at off-site noise sensitive locations would be largely similar to the Project with the outdoor performance sound restrictions in place. Thus, composite and mobile operational noise levels would be less than significant and similar to the Project.

(ii) Groundborne Noise and Vibration

(a) Construction

Alternative 6’s buildings and parking podiums would be constructed at grade and no excavation outside of site preparation and foundation construction would be required. As such, Alternative 6 would reduce the duration of construction activity associated with excavation and hauling required under the Project. Similar to the Project, maximum construction activity would subject adjacent off-site building structures to vibration. As with the Project, the estimated vibration velocity levels from all construction equipment (maximum construction conditions) under Alternative 6 would be below the building damage significance criteria at off-site building structures west and east of the West Site and East Site construction areas. However, as with the Project, the estimated construction vibration levels

under Alternative 6 would exceed the significance threshold at the Avalon Hollywood, the Pantages Theatre, the Yucca Street Art Deco Building Storefront, the AMDA Vine building, the Argyle House, the Commercial Building at 1718 Vine Street, the Capitol Records Building, and the Gogerty Building. Therefore, vibration impacts pursuant to the significance criteria for building damage, would be significant. As with the Project, with implementation of Mitigation Measure NOI-MM-4 and compliance with LAMC Section 91.3307.1, vibration impacts associated with Alternative 6 would be reduced to less-than-significant levels for the Capitol Records and Gogerty Buildings. However, similar to the Project, because consent of off-site property owners, who may not agree, would be required to implement the vibration mitigation for potential structural damage to their off-site structures, it is conservatively concluded that structural vibration impacts on the AMDA Vine Building, the Argyle House, the Commercial Building at 1718 Vine Street, the Pantages Theatre, Avalon Hollywood, and Art Deco Building Storefront would remain significant and unavoidable because it cannot be assured that all components of NOI-MM-4 can be implemented.

Regarding human annoyance, as with the Project, the estimated vibration levels due to maximum construction activity at the West Site under Alternative 6, would exceed the significance threshold for human annoyance at vibration sensitive receptors near the Project Site. Implementation of Mitigation Measure NOI-MM-4, under Alternative 6, as with the Project, may lessen, but would not reduce all human annoyance impacts to a less-than-significant level. Therefore, as with the Project, no feasible mitigation measures under Alternative 6 would reduce the temporary vibration impacts from on-site construction associated with human annoyance at the vibration-sensitive receptors 3, 5, 6, and 8 through 13. As with the Project, construction vibration levels would be significant and unavoidable under Alternative 6. However, because the overall duration of activity causing vibration would be less, impacts under Alternative 6 would be less than the Project.

(b) Operation

Day-to-day operations under Alternative 6, as with the Project, would include typical commercial-grade stationary mechanical and electrical equipment, which would produce vibration at low levels that would not cause damage or annoyance impacts to on-site or off-site environment. Primary sources of transient vibration would include vehicle circulation within the proposed parking areas, which would be confined to the immediate area and would not be expected to be perceptible off the Project Site. It is anticipated that mechanical equipment, including air handling units, condenser units, and exhaust fans, under Alternative 6, as with the Project, would be located on building rooftops. Therefore, as with the Project, groundborne vibration from the operation of such mechanical equipment under Alternative 6 would not impact any of the off-site sensitive receptors. Thus, similar to the Project, operational vibration impacts under Alternative 6 would be less than significant. As Alternative 6 would have a similar occupancy of the Project Site, off-site

groundborne operation vibration is not anticipated to be perceptible under Alternative 6, and, such, impacts under Alternative 6 would be similar to the Project

(j) Population and Housing

During operation, the Project and the Project with the East Site Hotel Option would have different population, housing, and employment generation statistics. However, both development scenarios would result in the same impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of the Alternative 6 apply to both the Project and the Project with the East Site Hotel Option.

Alternative 6 proposes the same number and type of residential units and the same amount of commercial square footage as the Project. Thus, Alternative 6's population and housing impacts would be less than significant and the same as the Project.

(k) Public Services

During operation, the Project and the Project with the East Site Hotel Option would have different service-related population statistics, such as number of residents or students. However, both development scenarios would result in the same impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of the Alternative 6 apply to both the Project and the Project with the East Site Hotel Option

(i) Fire Protection

Alternative 6 proposes the same number and type of residential units and the same amount of commercial square footage as the Project. Thus, Alternative 6's fire service population would be the same as the Project. The same fire protection features and infrastructure would be incorporated as part of Alternative 6 as the Project. As such, impacts with respect to fire protection would be less than significant and the same as the Project.

(ii) Police Protection

Alternative 6 proposes the same number and type of residential units and the same amount of commercial square footage as the Project. Thus, Alternative 6's police service population would be the same as the Project and such, the expected number of crimes would be the same as the Project. The same police protection features would be incorporated as part of Alternative 6 as the Project. As such, impacts with respect to police protection would be less than significant and the same as the Project.

(iii) Schools

Alternative 6 proposes the same number and type of residential units and the same amount of commercial square footage as the Project. Thus, Alternative 6 would

generate the same number and type of students. Alternative 6 would pay the same amount of school development fees per SB 50 as the Project. As such, impacts with respect to schools would be less than significant and the same as the Project.

(iv) Parks and Recreation

Alternative 6 proposes the same number and type of residential units and the same amount of commercial square footage as the Project. Thus, Alternative 6 would generate the same number of persons that would utilize parks and recreation facilities as the Project. As with the Project, impacts with respect to parks and recreation facilities would be less than significant. While Alternative 6 would include less publicly accessible open space, the extent of parks and recreation facility usage by Project residents under Alternative 6 would not be expected to be materially different such that impacts with respect to parks and recreation facilities would noticeably differ. As such, impacts with respect to parks and recreation under Alternative 6 would be similar to the Project.

(v) Libraries

Alternative 6 proposes the same number and type of residential units and the same amount of commercial square footage as the Project. Thus, Alternative 6 would generate the same number library patrons and extent of library usage as the Project. As such, impacts with respect to libraries would be less than significant and the same as the Project.

(l) Transportation

During operation, the Project and the Project with the East Site Hotel Option would have different overall VMT and VMT per capita statistics. However, both development scenarios would result in the same transportation-related impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of the Alternative 6 apply to both the Project and the Project with the East Site Hotel Option.

(i) Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities

Alternative 6, as with the Project, would support multimodal transportation options and a reduction in VMT, as well as promote transportation-related safety in the Project area. Alternative 6, as with the Project, would not conflict with policies of Mobility Plan 2035 and the City of Los Angeles Complete Streets Design Guide, adopted to protect the environment and reduce VMT. Similar to the Project, Alternative 6 would also be consistent with applicable transportation goals of the Hollywood Community Plan and the Hollywood Redevelopment Plan. Project Design Feature TRAF-PDF-1 under Alternative 6, as well as the Project, would implement a TDM Program to address parking, transit, commute trip reductions,

shared mobility, bicycle use, and pedestrian access, and TDM management strategies. These would include bicycle parking spaces, bike lockers, and showers for residents, employees, and visitors. Alternative 6, as with the Project, would not conflict with VisionZero to reduce traffic-related deaths; with LAMC Section 12.37 regarding street standards; with LADOT MPP, Section 321, regarding driveway design standards, or with the 1988 Hollywood Community Plan's Objective 6 to coordinate land use densities and to promote the use of transit. Alternative 6, as with the Project, would increase population density in close proximity to the Metro Red Line Hollywood/Vine Station, other regional Metro bus lines, and the LADOT DASH lines. Alternative 6, as with the Project, would also provide for road and pedestrian improvements, including a paseo linking the West Site and East Site and new median improvements along Vine Street, which would enhance pedestrian safety. A signalized mid-block crosswalk is proposed across Argyle Avenue to help facilitate local pedestrian circulation and access by maintaining a path of east-west travel with the existing mid-block crosswalks across Ivar Avenue and Vine Street. However, under Alternative 6, the paseo on the East Site would not continue through the Project linking Argyle Avenue to Vine Street. Thus, less pedestrian connectivity through the Project Site linking it to surrounding uses would occur under Alternative 6. Similar to the Project, Alternative 6 would not conflict with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities and, as such, impacts relative to plans and programs would be less than significant. However, due to decreased pedestrian access and connectivity through the Project Site, impacts would be greater than the Project.

(ii) Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)

As required under CEQA Guidelines Section 15064.3(b) and based on proposed land uses, floor areas, and TDM measures incorporated under Project Design Feature TRAF-PDF-1 (Transportation Demand Management Program), VMT standards would be applicable to Alternative 6, as well as the Project. Alternative 6 would have a household VMT of 4.8 per capita.[74] The Project would also have a household per capita VMT of 4.8. As with the project, Alternative 6, with less than 50,000 of retail use, would be exempt from an employee VMT per capita finding. The Project with the East Site Hotel Option would have a household VMT of 4.7 per capita and a work VMT of 4.8. These rates are all below the thresholds of significance proposed for the City's Central APC household per capita of 6.0 and work VMT of 7.6. per employee. As such, similar to the Project, impacts would be less than significant. As Alternative 6's household VMT per capita is the same as the Project, impacts with respect to CEQA Guidelines Section 15064(b) would be similar to the Project.

74 Fehr and Peers, Alternatives Transportation Analysis, March 2020, Appendix R of this Draft EIR.

(iii) Design Hazards

Alternative 6, as with the Project, would reduce existing curb cuts and provide new sidewalks around the perimeter of the Project Site. As with the Project, improvements under Alternative 6 would include a signalized mid-block crosswalk provided across Argyle Avenue to help facilitate local pedestrian circulation and access. As with the Project, Alternative 6 would provide a paseo, but it would not connect Vine Street to Argyle Avenue. However, this design difference would not lead to significant design hazards. Alternative 6, as with the Project, would eliminate driveway crossings on Vine Street. Access to the Capitol Records Complex (including both the Capitol Records Building and the Gogerty Building) would continue to be provided via the existing driveway on Yucca Street. Similar to the Project, total existing curb cuts would be reduced from 12 total to a total of five. The driveways would not require the removal or relocation of existing passenger transit stops, and would be designed and configured to avoid potential conflicts with transit services and pedestrian traffic. Alternative 6, as with the Project, would not substantially increase hazards, vehicle/pedestrian conflict, or preclude City action to fulfill or implement projects associated with these networks. Similar to the Project, Alternative 6 would contribute to overall walkability through enhancements to the Project Site, streetscape, and crossing of Argyle Avenue, and would not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. Impacts under Alternative 6 would be less than significant and similar to the Project.

(iv) Emergency Access

The Project Site is located in an established urban area served by the surrounding roadway network, and multiple routes exist in the area for emergency vehicles and evacuation. Drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Similar to the Project, no policy or procedural changes to an existing risk management plan, emergency response plan, or evacuation plan would be required due to implementation under Alternative 6. All driveways and the internal circulation would be subject to LAFD review to confirm adequate access is provided internally for on-site emergency vehicle access. With review and approval of Project Site access and circulation plans by the LAFD, Alternative 6, as with the Project, would not impair implementation of or physically interfere with adopted emergency response or emergency evacuation plans. Impacts regarding emergency access under Alternative 6 would be less than significant and similar to the Project.

(m) Tribal Cultural Resources

As tribal cultural resources impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparison of impacts of the Alternative 6 apply to both the Project and the Project with the East Site Hotel Option.

The City complied with AB 52 in its consultation and records searches conducted through SCCIC and the NAHC for the Archaeological and Paleontological Resources Assessment. The research indicated no known tribal cultural resources within the Project Site or surrounding area. However, as with the Project excavations associated with Alternative 6 could have a potential, albeit a low potential, to encounter previously unknown and buried tribal cultural resources. However, similar to the Project, in the event that buried tribal cultural resources are encountered during construction of Alternative 6, the Project Applicant will be required to comply with the City's standard Conditions of Approval for the treatment of inadvertent Tribal cultural resource discoveries. With compliance, Alternative 6, as with the Project, would result in less-than-significant impacts to tribal cultural resources. As excavation depths would be less, impacts to tribal cultural resources under Alternative 6 would be less than the Project.

(n) Utilities and Service Systems – Water, Wastewater, and Solid Waste

During operation, the Project and the Project with the East Site Hotel Option would have different utility demand statistics (i.e., water demand, wastewater generation, and solid waste generation). However, both development scenarios would result in the same impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of the Alternative 6 apply to both the Project and the Project with the East Site Hotel Option.

(i) Wastewater

The Project and Alternative 6 would generate additional wastewater and increase demand on the existing Hyperion Treatment Conveyance System and Hyperion Treatment Plant. As Alternative 6 and the Project would have the same occupancy, wastewater generation would be similar, acknowledging that outdoor landscaping may be vary slightly. As with the Project, the increase in wastewater generation by Alternative 6 would be within the capacity limits of the conveyance and treatment facilities serving the Project Site. Similar to the Project, impacts on wastewater conveyance and treatment systems under Alternative 6 would be less than significant. As Alternative 6 would generate a similar volume of wastewater, impacts under Alternative 6 would be similar to the Project.

(ii) Water Supply

Alternative 6 would increase demand on water supplies and infrastructure. Alternative 6's land uses and features, including residential units, landscaped area, retail/restaurant floor area and other features generating water demand would be similar to the Project. Thus, as with the Project, Alternative 6's water demand projections would be within LADWP's 2015 UWMP's projected increases in Citywide water demands, while anticipating multi-dry year water conditions through the planning horizon of 2040.

Furthermore, similar to the Project, operation of Alternative 6 would require new connections from existing facilities. With regulatory compliance to the LAMC and coordination with LADWP, operation of Alternative 6, as with the Project, would not result in the relocation or construction of new or expanded water facilities, the construction or relocation of which would cause significant environmental effects. Similar to the Project, operational impacts on water infrastructure under Alternative 6 would be less than significant.

Based on the above, Alternative 6 and the Project would result in less than significant and similar water supply and infrastructure impacts.

(iii) Solid Waste

Alternative 6, as with the Project, would increase solid waste generation at the Project Site that would need to be landfilled. Alternative 6 would generate a similar amount of construction waste as the Project, except during the excavation Phase where Alternative 6 would not include soil export activities associated with construction of subterranean levels. As with the Project, the maximum construction waste under the Alternative 6 would represent a small fraction of the available capacity of the County's Azusa Land Reclamation landfill or one of the inert debris engineered fill operations in Los Angeles County. As such, similar to the Project, solid waste impacts associated with construction under Alternative 6 would be less than significant. However, with substantially less excavation, impacts under Alternative 6 would be less than the Project.

As they have the same development program, operation of Alternative 6 and the Project would generate a similar amount of daily solid waste to be disposed of at landfills. As with the Project, Alternative 6's additional solid waste generation would be accommodated by the County's City-certified waste processing facilities. As with the Project, Alternative 6's 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. Similar to the Project, impacts with respect to solid waste under Alternative 6 would be less than significant. As Alternative 6 would generate a similar amount of solid waste, impacts under Alternative 6 would be similar to the Project.

(o) Energy Conservation and Infrastructure

During operation, the Project and the Project with the East Site Hotel Option would have different energy consumption statistics. However, both development scenarios would result in the same impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of the Alternative 6 apply to both the Project and the Project with the East Site Hotel Option.

(i) Efficient Energy Consumption

Similar to the Project, Alternative 6 would incorporate the same energy-conservation measures beyond regulatory requirements as specified in Project Design Features GHG-PDF-1 and WS-PDF-1. These require USGBC LEED Gold Certification energy performance optimization features such as reducing building energy cost by a minimum of 11.6 percent for new construction compared to the 2019 Title 24 Building Energy Efficiency Standards and installing energy efficient appliances. As with the Project, Alternative 6 would comply with and exceed existing minimum energy efficiency requirements, such as the Title 24 standards and CALGreen Code, including for building rooftops to be solar-ready so that on-site solar photovoltaic or solar water heating systems could be installed in the future. Alternative 6, as with the Project, would be designed to exceed ASHRAE 90.1-2010 standards by more than 20 percent through the use of efficient heating, ventilation, and HVAC systems and a high-performance building envelope. Indoor air quality would be enhanced through the selection of low- VOC-emitting materials, and exhaust systems would be utilized for optimal ventilation in both kitchens and bathrooms. Alternative 6, as with the Project, would meet the requirements of the Los Angeles Green Building Code and the CALGreen Code regarding on-site renewable energy sources.

Alternative 6, as with the Project, would be consistent with and not conflict with SCAG's land use type for the area and would encourage alternative transportation, and achieve a reduction in VMT resulting in a transportation efficiency level better than the Hollywood neighborhood and City and statewide average. Alternative 6, as with the Project would not cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation, and, as such, impacts related to efficient energy consumption would be less than significant. As both would similarly comply to applicable efficient energy consumption regulations, impacts under Alternative 6 would be similar to the Project

(ii) Conflict with Plans for Renewable Energy or Energy Efficiency

As with the Project, Alternative 6 would comply with existing energy standards, would include a project design and building operation that would incorporate energy-conservation measures beyond those otherwise required, and would not conflict with adopted energy conservation plans. Alternative 6, as with the Project, would be designed to meet the USGBC LEED Gold Certification including energy performance optimization features, such as reducing building energy demand by a minimum of 11.6 percent for new construction compared to the 2019 Title 24 Building Energy Efficiency Standards. Among other features it would install energy efficient appliances that meet the USEPA ENERGY STAR rating standards or equivalent; incorporate heat island reduction strategies, such as high-reflectance and vegetated roofs for the Project roof areas; provide water efficient fixtures and landscaping to reduce indoor water usage; and provide an HVAC system that

would be sized and designed in compliance with the CALGreen Code to maximize energy efficiency caused by heat loss and heat gain. Alternative 6, as with the Project, would have the same automobile fuel efficiencies associated with access to alternative modes of transportation.

By exceeding the regulatory standards, similar to the Project, Alternative 6 would have a less-than-significant impact regarding the provisions of plans for renewable energy and energy efficiency. As Alternative 6 would be in compliance with plans for renewable energy and energy efficiency, impacts under Alternative 6 would be similar to the Project

(iii) Relocation or Expansion of Energy Infrastructure

Alternative 6, as with the Project, would utilize energy infrastructure to accommodate respective demand for energy resources. Similar to the Project, Alternative 6's electricity and natural gas demand is expected to represent a small fraction of LADWP and SoCalGas energy supplies and the service provider's existing infrastructure. Planned electricity and natural gas supplies would be sufficient to meet the Project's demand for electricity and natural gas. As with the Project, Alternative 6 would not result in an increase in demand for electricity or natural gas services that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Similar to the Project, impacts with respect to the relocation or expansion of energy infrastructure under Alternative 6 would be less than significant. As off-site energy infrastructure would accommodate Alternative 6, impacts would be similar to the Project.

(3) Relationship of the Alternative to Project Objectives

As described above, Alternative 6, the Above Grade Parking Alternative, would provide the same mix of residential and retail uses as under the Project. The building design would also be similar, except that the Senior Buildings would be constructed above parking podiums. The taller buildings would rise to 46 stories on the East Site and 35 stories on the West Site as under the Project. As with the Project, proposed land uses for Alternative 6 include 872 market rate residential units, 133 senior affordable units, and 30,176 square feet of retail/restaurant uses. Alternative 6 would have the same occupied floor area as under the Project. Alternative 6 would include 24,541 square feet of publicly accessible open space; however, the paseo leading from Ivar Avenue would be blocked by a parking podium along Argyle Avenue, which would block views of the Capitol Records Building from the east.

As Alternative 6 would be similar to the Project, it would fully meet the following objectives:

2. Create a hub of activity surrounding the Capitol Records Complex and the intersection of Hollywood Boulevard and Vine Street, by activating the eastern end of Hollywood Boulevard and the terminus of the Hollywood Walk of Fame, to increase engagement with the Capitol Records Complex.

5. Promote local, regional, and State land use and mobility objectives and reduce vehicle miles traveled (VMT) by maximizing infill development within an existing Regional Center near jobs, retail, and entertainment in proximity to transit and transportation infrastructure that encourages pedestrian activity.

6. Provide senior housing with outdoor spaces in proximity to public transportation, allowing an age-specific demographic to continue to live in their residence of preference while maintaining access to services and goods.

7. Cluster jobs and housing near transit by locating a high-density, mixed-use development within a Transit Priority Area.

8. Support the growth of the City's economic base through the introduction of an economically viable project which creates a significant number of construction and permanent jobs.

9. Activate the Hollywood area with commercial opportunities that could serve local employees, generate local tax revenues, and provide new permanent jobs and housing for residents in support of local business.

10. Incorporate sustainable and green building design and construction to promote resource conservation, including waste reduction, efficient water management techniques, and conservation of energy to achieve a LEED-Gold equivalent building.

However, Alternative 6 would block more views of the Capitol Records Building, reduce the setback between the Capitol Records Building and the East Building, and provide less public open space than the Project. Therefore, it would only be partially consistent with the following objectives:

1. Redevelop the Project Site, with a mixed-use development that protects the architectural and historical heritage of the Capitol Records Complex and activates Hollywood Boulevard, Vine Street, and surrounding streets through connected, publicly available landscaped open space, including a paseo with shopping, seating, open air dining, and art installations, and plazas accommodating performances and community focused events.

3. Develop architecturally distinct buildings that are compatible with the Capitol Records Complex through a design that responds to the Capitol Records Building’s modernist architectural character, and preserve views of the Capitol Records Building.

4. Maintain prominent views of the Capitol Records Building by providing building setbacks, visual buffers, open space between the Project's new buildings and the Capitol Records Complex, and safe public viewing areas from the proposed paseo and plazas, to maximize view corridors and continue showcasing its distinctive architectural design.

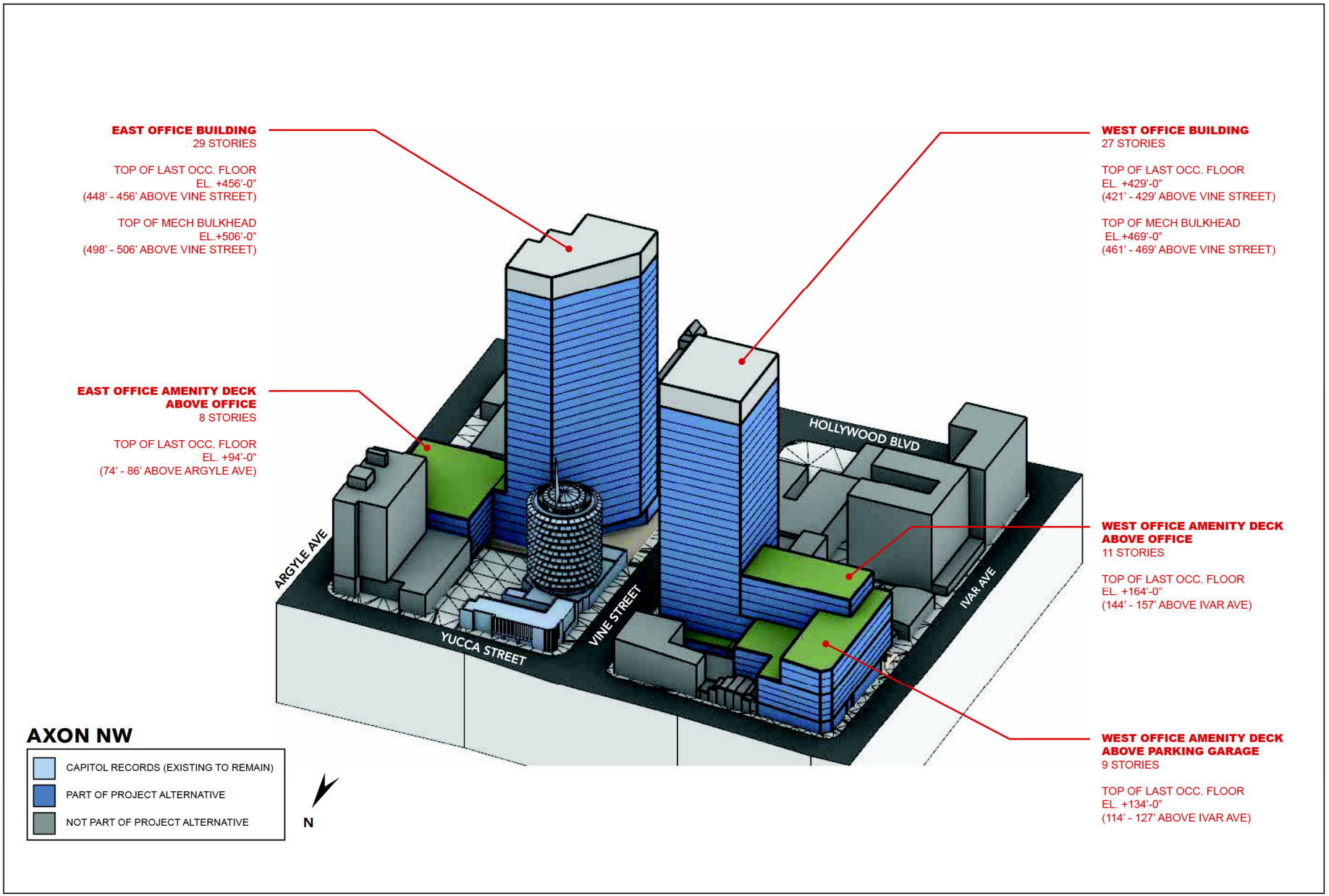
g) Alternative 7: Primarily Office Alternative

(1) Description of the Alternative

The Primarily Office Alternative (Alternative 7) would consist of only commercial uses. Alternative 7 would incorporate retail and restaurant floor area as under the Project. Approximately 17,485 square feet of retail and restaurant uses would be provided on the East Site, and approximately 14,083 square feet of retail and restaurant uses would be provided on the West Site, for a total of 31,568 square feet of retail and restaurant uses. Alternative 7 would also include the development of 537,280 square feet of office uses on the East Site (East Office Building) and 525,872 square feet of office uses on the West Site (West Office Building), for a total of 1,063,152 square feet of office floor area. Unlike the Project, Alternative 7 would not provide for the development of any residential uses.

As shown in **Figure V-16**, *Building Massing for Alternative 7*, the retail and office components of this Alternative would be provided in two buildings, one each on the East Site and the West Site. The East Office Building would be 29 stories and reach a height of 456 feet at the top of the 29th story and 506 feet at the top of the bulkhead. The West Office Building would be 27 stories and reach a height of 429 feet at the top of the 27th story and 469 feet at the top of the bulkhead. Alternative 7 would be developed with a total of 24,900 square feet of publicly accessible open space at the ground level. A paseo extending between Vine Street and Ivar Avenue would be provided on the West Site; however, because of a proposed parking structure along Argyle Avenue, the open space plaza on the East Site would only be accessible from Vine Street. The total new floor area for Alternative 7 would be approximately 1,094,720 square feet, which would result in an FAR of 6.017:1. A three-level subterranean parking structure and four-level parking podium, collectively containing 1,645 spaces, would be provided on the East Site, and a four-level subterranean parking structure and five-level parking podium, collectively containing 1,100 parking spaces, would be provided on the West Site, for a total of 2,745 parking spaces. Vehicle and bicycle parking would be provided in accordance with LAMC requirements.

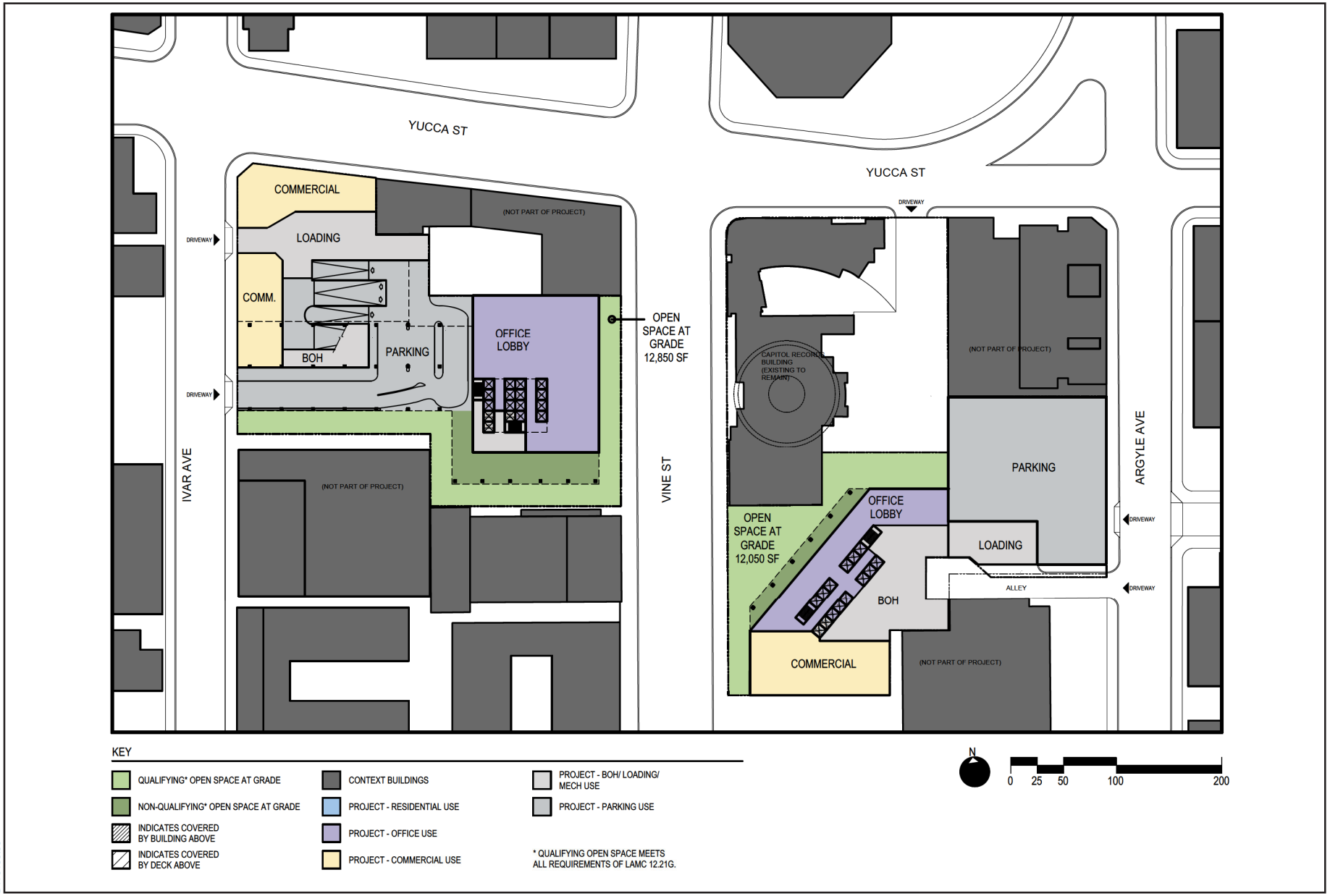
Figure V-17, *Alternative 7 Ground Floor Plan*, illustrates the uses and open space at the ground level, and **Figure V-18**, *Alternative 7 Building Footprints*, illustrates the location of proposed office buildings relative to the proposed ground level uses. The components of Alternative 7 are compared to those of the Project in **Table V-11**, *Comparison of Alternative 7 to the Project*, below.



SOURCE: Handel Architects, 2019

Hollywood Center Project

Figure V-16
Building Massing for Alternative 7

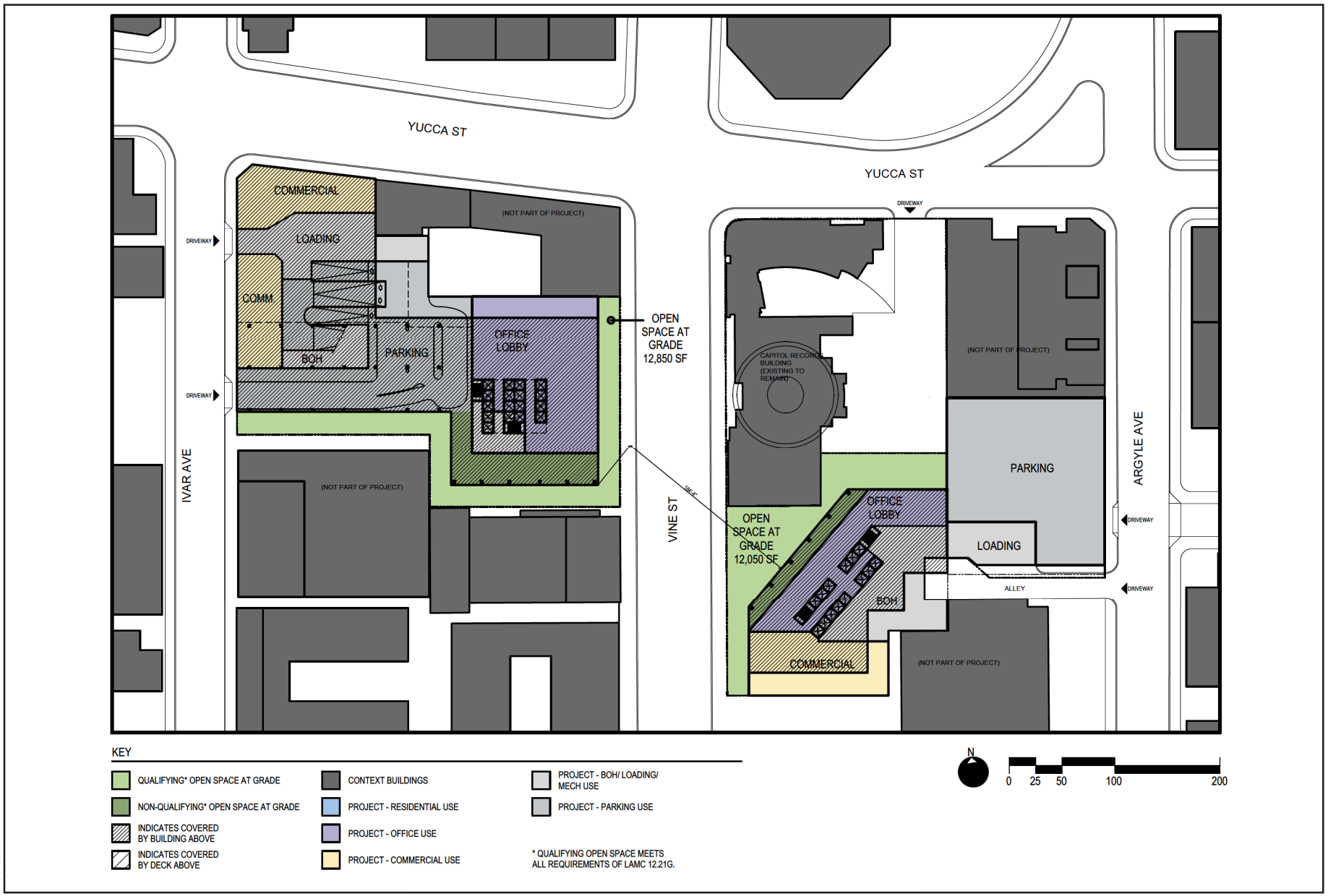


D170105.00

SOURCE: Handel Architects, 2020

Hollywood Center Project

Figure V-17
Alternative 7 Ground Floor Plan



D170105.00

SOURCE: Handel Architects, 2020

Hollywood Center Project

Figure V-18
Alternative 7 Building Footprints

TABLE V-11
COMPARISON OF ALTERNATIVE 7 TO THE PROJECT

Component	Project	Project With the East Site Hotel Option	Alternative 7
Publicly Accessible Open Space	33,922 sf	33,922 sf	24,900 sf
East Site	24,990 sf	24,990 sf	12,050 sf
West Site	8,932 sf	8,932 sf	12,850 sf
Maximum Building Height			
East Site	46 stories, 595 feet	46 stories, 595 feet	29 stories, 506 feet
West Site	35 stories, 469 feet	35 stories, 469 feet	27 stories, 469 feet
Market-Rate Units Total	872 du	768 du	0
East Site	423 du	319 du	0
West Site	449 du	449 du	0
Senior Affordable Units Total	133 du	116 du	0
East Site	65 du	48 du	0
West Site	68 du	68 du	0
Hotel	N/A	220 rooms	N/A
Maximum Building Height Senior Buildings			
East Site	11 stories, 149 feet	9 stories, 131 feet	0
West Site	11 stories, 155 feet	11 stories, 155 feet	0
New Office Floor Area	N/A 506 f	N/A	1,063,152 sf
East Site	N/A	N/A	537,280 sf
West Site	N/A	N/A	525,872 sf
Retail and Restaurant Floor Area Total	30,176 sf	30,176 sf	31,568 sf
East Site	17,485 sf	17,485 sf	17,485 sf
West Site	12,691 sf	12,691 sf	14,083 sf
Total New Floor Area (includes retail)	1,287,150 sf	1,277,741 sf	1,094,720 sf
East Site	638,407 sf	623,997 sf	554,765 sf
West Site	648,743 sf	648,744 sf	539,955 sf
Vehicle Parking	1,521 spaces	1,521 spaces	2,745 spaces
East Site	684 spaces	684 spaces	1,100 spaces
West Site	837 spaces	837 spaces	1,645 spaces
FAR[a]	6.973:1	6.901:1	6.017:1

[a] The calculated FAR includes new floor area in addition to the floor area of the Capitol Records and Gogerty Buildings (114,303 sf).

SOURCE: ESA, 2020

(2) Environmental Impacts

(a) Aesthetics

SB 743 (codified in PRC Section 21099(d)(1)) and ZI File No. 2452 provide that a mixed-use or employment center project in a designated TPA site and infill area is not required to evaluate physical aesthetic impacts pertaining to scenic vistas, scenic resources, and light and glare in an EIR. Although the Project and this Alternative meet these criteria, for disclosure purposes only, information based on City thresholds is provided relative to scenic vistas, scenic resources, and light and glare.

As aesthetics impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 7 apply to both the Project and the Project with the East Site Hotel Option.

(i) Scenic Vistas

Alternative 7 would involve the construction of two new buildings, including the 29-story East Office Building, which would reach a height of approximately 506 feet at the top of the bulkhead, and a 27-story West Site Office Building, which would reach a height of 469 feet at the top of the bulkhead. Construction and operation of Alternative 7 would affect public views across the existing surface parking lots and views of scenic elements within the Project Site. As with the Project, a construction fence will be erected along the periphery of the Project Site, including Vine Street (required under Project Design Feature AES-PDF-1), which would temporarily block views of the "Hollywood Jazz: 1945-1972" mural. Construction activities would also require the temporary removal of a portion of the Hollywood Walk of Fame. However, construction would be temporary and would not have a permanent substantial adverse effect on views of these features. As with the Project, the West Site's Office Building would block some passing views of the historic Knickerbocker sign from the Hollywood Freeway. However, because of the continuous movement of traffic and the availability of other freeway views to the sign, the effect on this view is not considered a substantial adverse effect for the Project or Alternative 7.

There are no existing significant panoramic views across the Project Site of the historic Hollywood Sign from adjacent streets or other public areas. Public views of broader scenic resources, such as the mountains and any views of the Hollywood Sign through street corridors, would continue to be available and would not be affected by construction or operation. As with the Project, Alternative 7 would block intermittent views of the historic Capitol Records Building from sections of Ivar Avenue, Hollywood Boulevard, and Argyle Avenue.

During construction and operation, the Capitol Records Building would continue to be visible from more prominent view locations, such as the Hollywood Hills or other sections along the affected local streets. An above-grade parking structure on Argyle Avenue would eliminate the paseo entrance along Argyle Avenue under Alternative 7. As such, views of the Capitol Records Building from Argyle Avenue would be blocked. As with the Project, the East Site Office Building would be set back from Vine Street to allow views of the Capitol Records Building from the intersection of Hollywood Boulevard and Vine Street. As with the Project, Alternative 7 would not result in substantial adverse effects on scenic vistas; however, because views of the Capitol Records Building from Argyle Avenue would be blocked, Alternative 7 would have a greater effect on scenic vistas than the Project.

(ii) Scenic Resources

Impacts on on-site scenic resources, such as the on-site Capitol Records Building and the "Hollywood Jazz: 1945-1972" mural, the adjacent Hollywood Walk of Fame, and existing street trees, under Alternative 7 would be the same as the Project. Similar to the Project, construction vehicles and other construction activity on or adjacent to the Vine Street sidewalk under Alternative 7 would potentially impact the Hollywood Walk of Fame. However, as with the Project, implementation of Mitigation Measure CUM-MM-1 would ensure protection and temporary removal of the bronze and terrazzo Hollywood Walk of Fame stars, and, as such, impacts on the Walk of Fame would be considered less than significant. As with the Project, Alternative 7 would replace removed street trees with similar species and plant additional trees within the Project Site's open space areas, including the paseo in accordance with the requirements of the LAMC and the City's Urban Forestry Division's requirements (currently requiring street tree replacement on a 2:1 basis). In addition, similar to the Project, Alternative 7 would preserve the "Hollywood Jazz: 1945-1972" mural. As with the Project, Alternative 7 would implement measures to ensure the Hollywood Walk of Fame is protected and that no physical changes to nearby scenic resources or historic buildings would occur. Therefore, when compared to the Project, the effects on scenic resources under Alternative 7 would be similar to the Project.

(iii) Regulations Governing Scenic Quality

CEQA Appendix G addresses whether a project in an urban area would conflict with regulations that govern scenic quality, such as those applicable to street trees, exterior lighting, signage, and compliance with applicable policies of the General Plan or Community Plan. As with the Project, Alternative 7 would replace street trees and provide exterior lighting in compliance with LAMC regulations and would comply with signage regulations set forth under the HSSUD. In addition, similar to the Project, Alternative 7 would not conflict with Objective 7 of the Hollywood Community Plan, which requires the preservation of open space and promotes the preservation of views, natural character and topography of mountainous parts of

the Hollywood community. The Project Site is visible from the Mulholland Scenic Parkway's Hollywood Bowl Overlook, an area with broad open space views in the Hollywood Hills. As with the Project, Alternative 7 would not adversely affect views from this open space area and, as such, would be consistent with Objective 7 of the Community Plan to preserve views. Therefore, similar to the Project, Alternative 7 would not conflict with the LAMC, HSSUD, or the applicable Community Plan open space policy. As with the Project, impacts under Alternative 7 would be less than significant. As Alternative 7 would also comply with regulations governing scenic quality, impacts under Alternative 7 would be similar to the Project.

(iv) Light and Glare

As with the Project, Alternative 7 would introduce new lighting, including temporary construction lighting, wayfinding lights, security lighting, landscape lighting, street-level commercial signs, paseo lighting, architectural accent lighting, and interior lighting visible through windows, all of which would be installed pursuant to LAMC lighting requirements. Architectural lighting would be provided at the top of the new buildings, as under the Project. In combination with the Capitol Records Building, any architectural lighting and signage would be consistent with HSSUD policy encouraging illuminated signage to reflect a modern, vibrant image of Hollywood. However, as with the Project, no still or moving images would be projected onto the buildings. Project Design Feature AES-PDF-3 would ensure that glass used in building façades will be anti-reflective or treated with an anti-reflective coating in order to minimize glare. Project Design Feature AES-PDF-4 would require that construction and operational lighting be shielded and directed downward (or on the specific on-site feature to be lit) in such a manner so as to avoid undue glare or light trespass onto adjacent uses. Similar to the Project, the incorporation of Project Design Features and LAMC requirements in Alternative 7 would ensure that potential light and glare would not adversely affect day or nighttime views. However, Alternative 7 would result in shorter buildings and reduced scale of lighting compared to the Project, and, as such, light and glare effects would be less than the Project.

(b) Air Quality

Daily air quality construction emissions would be similar under the Project and the Project with the East Site Hotel Option. While the Project and the Project with the East Site Hotel Option would have nominally different daily operational emissions, the impact conclusions, significance levels, and mitigation measures are the same for the Project and the Project with the East Site Hotel Option. Accordingly, the below comparisons of impacts of Alternative 7 apply to both the Project and the Project with the East Site Hotel Option.

(i) Conflict with an Air Quality Management Plan

Similar to the Project, Alternative 7 would include new development on the Project Site that would generate new criteria pollutant emissions. Similar to the Project, Alternative 7 would be consistent with the goals of SCAG's 2016-2040 RTP/SCS and growth projections in the 2016 AQMP, since the growth would occur in a HQTA and a TPA. As with the Project, Alternative 7 would be consistent with the AQMP in its incorporation of appropriate control strategies for emissions reduction during construction and operation. However, Alternative 7 would to a lesser degree than the Project, be consistent with applicable goals, objectives, and policies of the Air Quality Element of the General Plan that support and encourage pedestrian activity in the Hollywood area. Further, with no housing, Alternative 7 would not contribute to a land use pattern addressing housing needs while reducing vehicle trips and air pollutant emissions within a TPA. For these reasons, impacts under Alternative 7 with respect to consistency with air quality management plans would be less than significant but greater than the Project.

(ii) Cumulative Increase in Criteria Pollutants/Violation of Air Quality Standards

(a) Construction

As with the Project, Alternative 7's construction phases have the potential to generate emissions that would exceed SCAQMD air quality standards through the use of heavy-duty construction equipment, construction traffic, fugitive dust emissions, paving operation, and the application of architectural coatings and other building materials. The maximum emissions under Alternative 4 would be similar to the Project because emission levels are based on a single day in which maximum construction activity would occur. Similar to the Project, with implementation of Mitigation Measure AQ-MM-1, which would require the use of diesel-powered construction equipment that meet USEPA Tier 4 Final off-road emissions standards; use of pole electricity or alternative energy to power electric tools, equipment, and lighting; maintenance and operation of construction equipment to minimize exhaust emissions; and implementation of Project Design Feature GHG-PDF-1 (Green Building Features), construction emissions under Alternative 7 would not exceed SCAQMD numerical significance threshold (standards). Similar to the Project, because Alternative 7's construction emission levels would be below the applicable numerical significance thresholds, emissions related to air quality standards would be less than significant. However, Alternative 7, with approximately 1,094,720 square feet of floor area, would reduce the Project's scale of development by approximately 192,430 square feet or approximately 14.9 percent and, thus, would reduce the Project's overall construction duration. As Alternative 7 would reduce construction duration, impacts with respect to cumulative increases in criteria pollutants and violations of air quality standards would be less than the Project.

(b) Operation

During operation, Alternative 7 would generate emissions associated with vehicle trips, heating, lighting, other electric and natural gas power requirements, emergency generators, and architectural coatings. Alternative 7 would incorporate Project Design Feature GHG-PDF-1 (Green Building Features) and would comply with SCAQMD Rule 1113 regarding architectural coatings.

NOx emissions would be 76 and 79 pounds per day for the Project and the Project with the East Site Hotel Option, respectively. The daily impact threshold for NOx is 55 pounds per day. Despite the reduction in land use intensity, Alternative 7 would result in more traffic than the Project and require a sizeable generator that, along with its collective NOx generating sources, are expected to be above 55 pounds per day. Alternative 7 would implement the same Mitigation Measure AQ-MM-2 as the Project to reduce operational NOx levels to a less-than-significant level.

Similar to the Project, Alternative 7 would not exceed the SCAQMD numerical significance thresholds for VOC, CO, SOx, PM10, and PM2.5. Thus, as with the Project, impacts under Alternative 7 would be less than significant after mitigation for these criteria pollutants. However, because of its increased mobile source emissions, impacts under Alternative 7 with respect to cumulative increases in criteria pollutants and violations of air quality standards would be greater than Project.

(iii) Exposure of Sensitive Receptors to Pollutant Concentrations

(a) Localized Emissions

As with the Project, Alternative 7 would generate localized emissions during construction and operation. It can be expected that maximum daily localized construction emissions would be similar to the Project. As with the Project, maximum localized emissions associated with grading and architectural coatings during construction and charbroilers, landscaping, coatings, and use of consumer products, and other sources at sensitive receptors would be below the localized screening thresholds for NO_X, CO, PM10, and PM2.5, including at the nearest receptors adjacent to the Project Site. Therefore, similar to the Project, with respect to localized construction and operational emissions, impacts to sensitive receptors would be less than significant under Alternative 7. Based on energy consumption modeling for Alternative 7, natural gas usage in Alternative 7 would be approximately 3 percent higher and approximately 8 percent less when compared to the Project and the Project with the East Site Hotel Option, respectively.[75] Generally, natural gas usage is an indicator of localized emissions. While natural gas usage would be slightly higher for the Project and less than the Project with

75 Refer to Appendix R, Alternative Analyses, for CalEEMod operational energy demand worksheets for Alternative 7.

the East Site Hotel Option, Alternative 7 would reduce the scale of construction and overall building massing as compared to the Project. Thus, the difference in emissions would not be substantively different under Alternative 7 such that impacts to sensitive receptors would be materially different under Alternative 7 compared to the Project. For these reasons, impacts under Alternative 7 would be similar to the Project.

(b) Carbon Monoxide Hotspots

Vehicle trips would be higher under Alternative 7 than the Project. As discussed in Section IV.B, *Air Quality*, the intersection of Vine Street and Sunset Boulevard would have a maximum traffic volume of approximately 78,380 ADT under the Project buildout scenario and a maximum traffic volume of approximately 78,420 under the Project with the East Site Hotel Option scenario based on future year 2027 traffic volumes. Total traffic volumes would likely have to more than double to cause or contribute to a CO hotspot impact. As with the Project, Alternative 7 would not cause traffic volumes to double at the maximum impacted intersection. Thus, similar to the Project, Alternative 7 would not cause or contribute considerably to the formation of CO hotspots and impacts would be less than significant. However, because Alternative 7 would increase the Project's daily vehicle trips, impacts would be greater than the Project.

(c) Toxic Air Contaminants

(i) Construction

Under Alternative 7, as with the Project, temporary TAC emissions associated with DPM emissions from heavy construction equipment would occur during construction activities. Mitigation Measure AQ-MM-1 would require utilization of off-road diesel-powered construction equipment that meets or exceeds the most stringent and environmentally protective CARB and USEPA Tier 4 off-road emissions standards. The Tier 4 standards would reduce DPM emissions by approximately 81 to 96 percent compared to equipment that meet the Tier 2 off-road emissions standards. Similar to the Project, with implementation of the required mitigation, Alternative 7 would not expose sensitive receptors to substantial TAC concentrations, and impacts would be less than significant. However, because Alternative 7 would reduce the scale and duration of construction activities, impacts under Alternative 7 would be less than the Project.

(ii) Operation

Alternative 7, as with the Project, would use consumer products and architectural coatings or involve other sources, such as charbroiling associated with restaurant uses. TAC emissions from these sources are anticipated to be minimal and all restaurant emissions would be regulated under SCAQMD Rule 1138. In addition, Alternative 7 would provide stationary emergency generators for its buildings. The emergency generators would result in emissions during maintenance and testing

operations. Emergency generators are permitted by the SCAQMD and regulated under SCAQMD Rule 1470. Maintenance and testing would occur periodically, up to 50 hours per year per Rule 1470. As with the Project, Alternative 7's land uses would not include installation of industrial-sized paint booths or require extensive use of commercial cleaning products. Alternative 7 would generate only minor amounts of diesel emissions from mobile sources (non-on-site construction vehicles), such as delivery trucks that would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. Furthermore, trucks would be required to comply with the applicable provisions of the CARB 13 CCR, Section 2025 (Truck and Bus regulation) to minimize and reduce PM and NO_X emissions from existing diesel trucks. However, with its office component, there would be more delivery trucks to the Project Site under Alternative 7 than the Project. Nonetheless, toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the uses expected on the Project Site, as with the Project, potential long-term operational impacts associated with the release of TACs under Alternative 7 would be minimal, regulated, and controlled, and would not be expected to exceed the applicable SCAQMD numerical significance thresholds. Operation of Alternative 7, as with the Project, would not expose sensitive receptors to substantial TAC concentrations, and operational impacts would be less than significant. Accordingly, impacts with respect to TAC emissions under Alternative 7 would be similar to the Project.

(d) Other Emissions Affecting a Substantial Number of People

Activities under Alternative 7 would potentially generate other emissions, such as those leading to odors. These may include the use of architectural coatings and solvents, as well as the combustion of diesel fuel in on-and off-road equipment. SCAQMD Rule 1113 would limit the amount of VOCs in architectural coatings and solvents. In addition, Alternative 7 would comply with the applicable provisions of the CARB Air Toxics Control Measure regarding idling limitations for diesel trucks. Through mandatory compliance with SCAQMD rules, construction activities and materials are not expected to result in emissions that would create objectionable odors affecting a substantial number of people. Operation of Alternative 7 would not involve land uses typically associated with odor complaints, such as agricultural uses or food processing plants, or any uses identified by the SCAQMD as being associated with substantial odors. As with the Project, Alternative 7 is not expected to discharge contaminants into the air in quantities that would cause a nuisance, injury, or annoyance to the public or property pursuant to SCAQMD Rule 402. Therefore, as with the Project, odor and other emissions impacts under Alternative 7 would be less than significant. Accordingly, impacts with respect to other emissions under Alternative 7 would be similar to the Project.

(c) Cultural Resources

As cultural resources impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 7 apply to both the Project and the Project with the East Site Hotel Option.

(i) Historical Resources

As with the Project, Alternative 7 would not demolish or cause an adverse material change in the eligibility of any historical resources within the Project Site due to direct impacts. Building heights under Alternative 7 (29 stories on the East Site and 27 stories on the West Site) would be lower than the Project and, thus, more consistent with Hollywood's existing built environment than the Project, which would result in 46- and 35-story buildings on the East Site and West Site, respectively. Compared to the Project, Alternative 7 would have less effect related to contrasting building heights, although potential indirect impacts associated with this contrast under the Project would be less than significant. Therefore, as with the Project, indirect impacts associated with contrasting building heights would be less than significant under Alternative 7; however, impacts would be incrementally less under Alternative 7 than the Project because of the reduction in building heights.

As with the Project, Alternative 7 would also result in temporary alterations to the Hollywood Walk of Fame and potentially significant and unavoidable impacts due to structural vibration at nearby historical resources during construction. As with the Project, impacts associated with Alternative 7 could be reduced to less-than-significant with implementation of Mitigation Measures CUL-MM-1, CUL-MM-2, and NOI-MM-4. As with the Project, the mitigation available for Alternative 7 would avoid significant impacts on the Capitol Records Building and Gogerty Building and would provide similar protections to the other proximate historical buildings subject to potential structural damage from vibration, as follows: the Pantages Theatre, Avalon Hollywood, and the building located at 6316-24 Yucca Street/Art Deco Storefront. However, because Mitigation Measure CUL-MM-2 and Mitigation Measure NOI-MM-4 require the consent of other property owners, who may not agree to participate in their implementation, it is conservatively concluded that structural vibration and settlement impacts on proximate historical resources would remain significant and unavoidable after implementation of mitigation measures. Nonetheless, because Alternative 7 would reduce the extent and duration of the Project's building construction, vibration impacts under Alternative 7 would be less than the Project, and, thus, impacts to historical resources under Alternative 7 would be less than the Project.

(ii) Archaeological Resources

Alternative 7 would require excavations for subterranean parking structures, reaching depths of approximately 33 feet on the East Site and approximately 50

feet on the West Site. In contrast, Project would require parking structure excavations to depths of approximately 64 feet on both Sites. Although the extent and depth of excavation would be reduced under Alternative 7, similar to the Project, excavations would cut into the historic fill layer, as well as previously undisturbed native soils. Such depths would have the potential to encounter prehistoric and/or historic archaeological resources. Alternative 7, as with the Project, would implement Mitigation Measures CUL-MM-3 through CUL-MM-5. With the implementation of these measures, Alternative 7, as with the Project, would provide for appropriate treatment and/or preservation of resources if encountered. Under Alternative 7, as with the Project, potentially significant impacts to archaeological resources would be mitigated to a less-than-significant level. Thus, impacts related to archaeological resources under Alternative 7 would less than significant. However, because Alternative 7 would involve less excavation, it would have less potential impact on such resources. Thus, impacts related to archaeological resources under Alternative 7 would be less than the Project.

(iii) Human Remains

Excavation associated with Alternative 7 would reach depths of approximately 33 feet on the East Site and approximately 50 feet on the West Site. In contrast, the Project would require parking structure excavations to depths of approximately 64 feet on both Sites. Pursuant to California Health and Safety Code Section 7050.5, Public Resources Code 5097.98, and California Code of Regulations Section 15604.5(e), any discovery of unrecorded human remains would require the immediate halting of construction or ground-disturbing activities and notification of the County Coroner. If the remains are determined to be Native American in origin, a “Most Likely Descendent” would be contacted to assist in determining appropriate treatment for the remains. In the event of the discovery of unrecorded human remains during construction, as with the Project, compliance with applicable regulatory requirements would ensure potential impacts are less than significant. Although excavation depths would be reduced under Alternative 7, it would have similar potential as the Project to intercept human remains, which are anticipated to occur in shallower soils. Therefore, impacts with respect to human remains under Alternative 7 would be similar to the Project.

(d) Geology and Soils

As geology and soils impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 7 apply to both the Project and the Project with the East Site Hotel Option.

(i) Seismic Hazards

The Project Site is located within the designated Alquist-Priolo Earthquake Fault Zone for the Hollywood Fault; however, underlying soil horizons indicate the

Project Site has not experienced fault movement for at least 120,000 years and active faulting does not occur beneath the Project Site. Similar to the Project, excavation for Alternative 7's subterranean parking would remove the loose sand deposit and require suitable engineered stabilization in accordance with applicable City and CBC building regulations. The Project Site is not located within a designated landslide area, and the potential for landslide and seismically induced slope instability at the Project Site is considered to be low. As with the Project, Alternative 7's application of appropriate engineering controls and compliance with regulations for planned excavation and construction would minimize any potential site stability geologic hazards at the Project Site. Therefore, development of Alternative 7, as with the Project, would not result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury caused in whole or in part by exacerbation of existing environmental conditions. As with the Project, impacts related to geologic conditions under Alternative 7 would be less than significant through proper engineering methods and compliance with City and CBC building regulations. With implementation of building regulations and recommendations of applicable final geotechnical reports, impacts with respect to seismic hazards under Alternative 7 would be similar to the Project.

(ii) Soil Erosion or Loss of Topsoil

Excavation associated with Alternative 7 would reach depths of approximately 33 feet on the East Site and approximately 55 feet on the West Site. In contrast, Project would require parking structure excavations to depths of approximately 64 feet on both Sites. Construction of Alternative 7, as with the Project, would increase soil exposure and risk of soil erosion. The potential for water erosion under Alternative 7 would be reduced by the implementation of standard erosion control measures during site preparation and grading activities. Construction activities would be carried out in accordance with applicable City standard erosion control practices required pursuant to the CBC and the requirements of the NPDES Construction General Permit issued by the LARWQCB, as applicable. In accordance with these requirements, a SWPPP would be prepared that incorporates BMPs to control water erosion during the construction period. Following construction, the Project Site would be covered completely by paving, structures, and landscaping, which would not leave any exposed areas of bare soil susceptible to erosion. Thus, similar to the Project, impacts due to erosion of topsoil would be less than significant under Alternative 7. Alternative 7, like the Project, would comply with CBC building regulations and implement a SWPPP and BMPs and, as with the Project, would result in less than significant soil erosion impacts. Based on the above, impacts under Alternative 7 would be similar to the Project.

(iii) Unstable Geologic Units

Alternative 7, as with the Project, would include sloped excavations properly shored in accordance with the applicable provisions of the CBC to minimize the

potential for site stability hazards during temporary excavation activities. As with the Project, Alternative 7 would not be located on an unstable geologic unit. In addition, Alternative 7 would comply with CBC requirements and, prior to issuance of a grading permit, a qualified geotechnical engineer must prepare and submit to the LADBS a Final Geotechnical Report that includes site-specific design recommendations for seismic safety and design requirements for foundations, retaining walls/shoring and excavation to meet applicable State and City code and regulations. As with the Project, through adherence to the CBC and the recommendations of the Final Geotechnical Report, impacts with respect to geologic units under Alternative 7 would be less than significant and similar to the Project.

(iv) Expansive Soils

Similar to the Project, Alternative 7 would encounter and remove near surface soils that have a low to medium potential for expansion during excavation activities. In addition, expansive soil hazards would be further evaluated for the Project Site as part of the LADBS approved Final Geotechnical Report that would include site-specific design recommendations for addressing expansive soils, as needed. Further, as with the Project, compliance with standard construction and engineering practices, and proper engineering erosion control and drainage design would ensure that hazards associated with potential expansive soils or corrosive soils are properly addressed. As such, as with the Project, impacts related to expansive soils or corrosive soils under Alternative 7 would be less than significant and similar to the Project.

(v) Paleontological Resources

Alternative 7 would require excavations for subterranean parking structures, reaching depths of approximately 33 feet on the East Site and approximately 55 feet on the West Site. In contrast, the Project would require parking structure excavations to depths of approximately 64 feet on both Sites. Nonetheless, excavations under Alternative 7, as with the Project, could access high sensitivity alluvial sediments. This classification indicates a high potential for fossils to be present in the subsurface. Similar to the Project, implementation of Mitigation Measures GEO-MM-1 through GEO-MM-3 under Alternative 7 would provide for appropriate treatment and/or preservation of resources and would mitigate impacts to paleontological resources to less-than-significant. However, because excavation depths would be less under Alternative 7, impacts related to paleontological resources would be less than the Project.

(e) Greenhouse Gas Emissions

Despite the Project and the Project with the East Site Hotel Option having slightly different overall GHG emissions, because impact conclusions and significance levels related to GHG emissions would be the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of

Alternative 7 apply to both the Project and the Project with the East Site Hotel Option.

The construction and occupancy of the Project Site under Alternative 7, as with the Project, would increase GHG emissions over existing conditions. As with the Project, Alternative 7 would incorporate GHG reduction characteristics, features, and measures. Although the State and City have not established quantitative values for GHG emissions, in order to comply with policies and regulations adopted for the purpose of reducing or mitigating GHG emissions, Alternative 7, as with the Project, would incorporate AQ-PDF-1, AQ-PDF-2 and GHG-PDF-1. Despite its smaller scale, Alternative 7 would result in increased traffic and higher mobile emissions, and, thus, maximum GHG operational emissions would be higher than the Project. With incorporation of applicable Project Design Features, GHG emission impacts under Alternative 7, as with the Project, would be less than significant. Due to its higher GHG emissions, impacts under Alternative 7 with respect to GHG emissions on the environment would be greater than the Project.

Alternative 7, as with the Project, with incorporation of AQ-PDF-1, AQ-PDF-2 and GHG-PDF-1, would be consistent with applicable strategies outlined in CARB's Climate Change Scoping Plan, SCAG's 2016-2040 RTP/SCS, Sustainable City pLAn, and the City's Green Building Code. As such, similar to the Project, impacts related to conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs would be less than significant under Alternative 7. As discussed under the Transportation subsection, below, Alternative 7 would result in employee 4.5 VMT per capita. The Project would result in 4.8 household per capita VMT and the Project with the East Site Hotel Option would result in a 4.7 household per capita VMT and 4.8 work VMT per employee. As such, Alternative 7 would not exceed the Central APC's employee threshold standard of 7.5. However, Alternative 7, despite its lower work VMT per employee, as an all-commercial use, it would not meet the objectives of adopted policies and land use strategies to reduce GHGs through mixed-use development within the TPA to the same extent as under the Project, and, thus, impacts related to GHG reduction policies would be greater than the Project.

(f) Hazards and Hazardous Materials

As impacts related to hazards and hazardous materials would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 7 apply to both the Project and the Project with the East Site Hotel Option.

(i) Hazards to the Public or Environment through the Routine Transport, Use, or Disposal of Hazardous Materials

Construction of Alternative 7, as with the Project, would include demolition of existing parking surfaces and structures other than the Capitol Records Complex. Construction equipment and materials, such as fuels, oils and lubricants, solvents and cleaners, adhesives, paints and thinners, degreasers, cement and concrete, and asphalt mixtures, which are all commonly used in construction, would be used, stored, and disposed of in consumer quantities and in accordance with applicable laws and regulations and manufacturers' instructions. As with the Project, operation of Alternative 7 would involve the limited use of potentially hazardous materials typical of those used in offices and restaurants, including cleaning agents, paints, pesticides, and other materials used for landscaping. In addition, hazardous materials on the Project Site would continue to be acquired, handled, used, stored, and disposed of in accordance with all manufacturers' specifications and all applicable federal, State, and local requirements. Compliance with all applicable regulations concerning the transport, use, and disposal of hazardous waste under Alternative 7, as with the Project, would reduce hazardous materials impacts to a less-than-significant level. As Alternative 7 and the Project would be consistent with applicable regulations, and both would have a high operational activity level, impacts related to the transport and use of hazardous materials under Alternative 7 would be similar to the Project.

(ii) Hazard to the Public or Environment Involving the Accidental Release of Hazardous Materials into the Environment

Alternative 7 would require excavation of soil for up to 55 feet for subterranean parking. Such excavation could expose the public or the environment to contaminated soils and soil vapors and could reveal remnant steel structures and/or possibly USTs associated with historic automobile gas and service stations. As with the Project, under Alternative 7, Mitigation Measure HAZ-MM-1 (Soil Management Plan), would be implemented and would establish policy and requirements for the disposal of contaminated soils and management of soil vapors or other gases during excavation activities. Therefore, impacts under Alternative 7 related to the accidental release of hazardous materials during construction would be less than significant after mitigation and similar to the Project.

(iii) Hazard Resulting from Hazardous or Acutely Hazardous Materials, Substances, or Waste within One-Quarter Mile of a School

Alternative 7, as with the Project, is not located within one-quarter mile of a school. Similar to the Project, Alternative 7 would implement Mitigation Measure HAZ-MM-

1 (Soil Management Plan), which would establish policy and requirements during construction for the disposal of contaminated soils and management of soil vapors or other gases during excavation activities. Also, similar to the Project, Mitigation Measure AQ-MM-1 would be implemented under Alternative 7 requiring the use of Tier IV construction equipment to minimize TAC emissions. In addition, during operation Alternative 7 would not require the handling of acutely hazardous materials or result in the emission of hazardous materials other than, potentially, VOCs. associated with diesel vehicles and consumer products (e.g., architectural coatings, household cleaners, landscaping fertilizers and pesticides, etc.). Alternative 7, as with the Project, during operation would only require the limited use of potentially hazardous materials associated with maintenance and landscaping. In addition, Alternative 7 would comply with applicable local, State, and Federal laws and regulations relating to the use of hazardous or acutely hazardous materials and would implement Mitigation Measure HAZ-MM-1 (Soils Management Plan) to ensure that any existing vapors or materials within the existing site would be safely managed. Therefore, as with the Project, impacts related to the use of hazardous or acutely hazardous materials within a quarter mile of a school under Alternative 7 would be less than significant, and similar to the Project.

(iv) Hazardous Materials Sites

Alternative 7, similar to the Project, would not involve construction or alter existing activities on a hazardous materials site compiled pursuant to Government Code Section 65962.5. Accordingly, Alternative 7 and the Project would have no impact with regard to development occurring on a hazardous materials site. Thus, impacts related to development on a hazardous materials site under Alternative 7 would be similar to the Project.

(v) Emergency Response Plan/Emergency Evacuation Plan

Alternative 7, as with the Project, would involve new construction and increased traffic. Alternative 7, as with the Project, would not however, affect the City's Emergency Operations Plan or established disaster evacuation routes, the nearest of which are Santa Monica Boulevard approximately 0.8 miles to the south and Highland Avenue approximately 0.6 miles to the west. As with the Project, Alternative 7 would not require any policy or procedural changes to the City of Los Angeles Emergency Operations Plan or the City's established disaster routes. Also, during an unanticipated disaster event, LAPD and LAFD would implement operational protocols, as well as plans and programs, on a case-by-case basis, to facilitate emergency evacuations and/or response, which would consider traffic conditions at the time of the emergency. In such instances, traffic would be routed along the City's numerous disaster routes, as determined appropriate by the responding City agencies. Similar to the Project, construction and operation of Alternative 7 would not close any existing streets or otherwise represent a

significant impediment to emergency response or evacuation of the local area. Construction of Alternative 7, as with the Project, would occur within the boundaries of the Project Site and within the rights-of-way of adjacent streets, including the median within Vine Street and signal installation along Argyle Avenue. Temporary partial lane closures are not anticipated to significantly affect the circulation of emergency vehicles, which normally have a variety of options for dealing with traffic and congestion, such as sirens, priority use of the roadway, and use of alternate routing. In addition, Alternative 7, as with the Project, would implement Project Design Feature TRAF-PDF-2, which requires preparation of a Construction Traffic Management Plan and includes street closure information, a detour plan, haul routes, and a staging plan. The Construction Traffic Management Plan will be submitted to the City for review and approval. With Project Design Feature TRAF-PDF-2, construction of Alternative 7, like the Project, would not substantially impede public access, create severe consequences for emergency response vehicles, substantially impede travel upon a public right-of-way, or interfere with an adopted emergency response or evacuation plan. During operation, Alternative 7, as with the Project, would be required to establish, implement, and maintain an emergency response plan. The emergency response plan, which would be submitted to the LAFD for inspection and approval prior to implementation, would be inspected annually by the LAFD and include evacuation procedures. In addition, the California Fire Code, Chapter 10, Means of Egress, requires that all habitable structures comply with the California Fire Code, including providing ingress and egress during emergencies. As with the Project, compliance with existing regulations would ensure that an adequate emergency response plan is established for Alternative 7. Overall, as with the Project, impacts under Alternative 7 with respect to conflicts with or interfering with emergency response or evacuation plans would be less than significant. However, because Alternative 7 would generate more daily vehicle trips and result in higher occupancy than the Project, impacts with regard to emergency response would be greater than the Project.

(g) Hydrology and Water Quality

As hydrology and water quality impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 7 apply to both the Project and the Project with the East Site Hotel Option.

(i) *Water Quality*

(a) Construction

Alternative 7, as with the Project, would include construction activities, including earth moving, maintenance/operation of construction equipment, potential dewatering, and handling/storage/disposal of materials, that could contribute to pollutant loading in stormwater runoff from the construction site. Also, wind could

convey exposed and stockpiled soils at the construction site into nearby storm drains during storm events, and on-site water activities for dust suppression purposes could contribute to pollutant loading in runoff from the construction site. Alternative 7 would excavate for subterranean garages to depths up to 55 feet, reaching deeper levels for foundation features. Groundwater depths range from less than 49.2 bgs to approximately 98.3 feet bgs across the Project Site. Alternative 7, as with the Project, has the potential to encounter groundwater during construction. Dewatering, which is subject to LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, may be required. The potential impact related to pollutant loading or groundwater quality that would cause exceedances of water quality standards would be reduced to less-than-significant levels for Alternative 7, as well as the Project, through compliance with regulatory requirements, BMPs, and Building Code grading procedures. However, because of the reduced scale and depth of excavation under Alternative 7, the potential exposure of excavated soils to the elements and encroachment into the water table would be unlikely and less than the Project. As such, the potential impact with respect to violations of water quality standards during construction would be less under Alternative 7 than the Project.

(b) Operation

Alternative 7, as with the Project, would incorporate a drainage collection and conveyance system that would detain and treat/filter runoff in compliance with the City's LID Manual requirements to reduce the quantity of, and improve the quality of, rainfall runoff leaving the Project Site. With the implementation of such system and BMPs, Alternative 7, as with the Project, would result in an improvement in the quality of stormwater runoff from the Project Site compared to existing conditions. As with the Project, impacts related to water quality standards under Alternative 7 would be less than significant and would be similar to the Project.

(ii) Decreases in Groundwater Supplies or Recharge

Alternative 7, as with the Project, would not require groundwater withdrawal. However, similar to the Project, excavation for the foundations and the subterranean garages during construction of Alternative 7 would have the potential to intercept the groundwater table and, as such, some groundwater removal may be required during construction. Such dewatering during construction would not result in the substantial removal of groundwater that would reduce the local groundwater table. Further, dewatering would only occur temporarily during construction and would not continue post-construction

Under Alternative 7, as with the Project, subterranean parking would be below the redeveloped areas of the Project Site, resulting in no material change to the amount of stormwater that would percolate into the groundwater table compared

to existing conditions. Therefore, similar to the Project, pre- and post-Project infiltration volumes are considered effectively equivalent under Alternative 7. Accordingly, similar to the Project, there would not be a substantial reduction in groundwater recharge from current conditions, and Alternative 7 would not introduce activities that could impede sustainable groundwater management of the basin.

Overall, neither Alternative 7 nor the Project would cause substantial depletion of groundwater supplies or substantially interfere with groundwater recharge. Therefore, the impact regarding groundwater recharge or depletion under Alternative 7 would be less than significant and similar to the Project

(iii) Alteration of Drainage Pattern

(a) Construction

Alternative 7, as with the Project, would include construction activities that could contribute to erosion or siltation if soils are exposed during development of the Project Site. Alternative 7 would require substantially less excavation and export of materials compared to the Project. Similar to the Project, Alternative 7 would cause a temporary increase in permeable surfaces during construction that would reduce, rather than increase, off-site runoff from the Project Site during a portion of the construction. As with the Project, construction BMPs to manage runoff flows and avoid on- or off-site flooding, would be implemented under Alternative 7. As with the Project, the BMPs would reduce runoff that would potentially create or contribute runoff water exceeding the capacity of existing or planned stormwater drainage systems. With implementation of BMPs, impacts with respect to surface runoff, siltation, rates of runoff and capacity of drainage systems under Alternative 7, as with the Project, would be less than significant. Although the duration of construction activities would be less under Alternative 7 than under the Project, the maximum off-site flow of Alternative 7 would be similar and the impact regarding stormwater drainage system capacity would be similar to the Project. However, because excavation volumes would be substantially less under Alternative 7 than under the Project, the potential impact under Alternative 7 associated with alteration of a drainage pattern resulting in erosion or siltation during construction would be less than the Project.

(b) Operation

Alternative 7, as with the Project, would largely maintain existing drainage patterns at the Project Site. As with the Project, Alternative 7 would include a drainage system that meets City stormwater retention, treatment and runoff requirements, including all applicable LID requirements. Additionally, under Alternative 7, as with the Project, a reduced peak flow rate of stormwater runoff from the Project Site would occur due to the retention afforded by the proposed LID system and LID BMPs. As of similarity in site coverage and in the proposed stormwater retention

system, the volume of stormwater runoff from the Project Site requiring conveyance by the existing off-site storm drain system would decrease to the same extent under Alternative 7 as with the Project. Therefore, impacts under Alternative 7 would be less than significant and similar to the Project.

(iv) Pollutant Release in Flood Hazard, Tsunami, or Seiche Zones

The Project Site is not located within a 100-year floodplain and is not in a tsunami zone and would not be subject to such flooding hazards. The Project Site is located approximately one mile from the Hollywood Reservoir. Given the distance to the Hollywood Reservoir, any oscillation and subsequent release of water within the reservoir as part of a seiche would not inundate the Project Site. Thus, there would be no potential for risk of release of pollutants due to inundation by seiche.

The Project Site is located within the Hollywood Reservoir inundation area.[76] In compliance with applicable regulatory requirements, Alternative 7, as with the Project, would implement BMPs to minimize pollutants within the Project Site during construction. Post-construction, the nature of pollutants would be typical of other developed sites within the dam inundation area. Dam safety regulations executed by the California Department of Water Resources and other agencies are the primary means of reducing damage or injury due to inundation occurring from dam failure, and reduce the likelihood of inundation. Regarding pollutant release, because Alternative 7, as with the Project, would actively maintain a stormwater management system and would be entirely developed with enclosed parking, buildings, and established landscaping, the exposure of flood waters to pollutants would be minimized. Thus, in the unlikely event of on-site inundation, Alternative 7, like the Project, would not result in the release of significant types or quantities of pollutants. As with the Project, impacts with respect to a significant risk of release of pollutants to inundation by flooding, tsunami, or seiche under Alternative 7 would be less than significant and would be similar to the Project.

(v) Implementation of Water Quality Control Plans

Alternative 7, as with the Project, would incorporate into its design an on-site drainage system that would be consistent with water quality control plans, the policies of which are expressed in City and State water quality regulations for the protection of water resources. Alternative 7, as with the Project, falls within the jurisdiction of water quality plan regulations that assure that development projects are in compliance with clean water policies. These plans and regulations include the LARWQB (Region 4) Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties; and the NPDES stormwater permitting program. In compliance with the City's LID requirements, Alternative 7, as with the Project

[76] California Depart. of Water Resources, Division of Safety of Dams, Dam Inundation Map for Mulholland Dam, https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2, accessed March 15, 2020.

would install a capture and reuse system on each site. The detention would temporarily store the captured stormwater until the stored volume is entirely used through the irrigation systems. The on-site drainage system would also provide BMPs in accordance with the City's LID requirements. As with the Project, impacts related to water quality control plans under Alternative 7 would be less than significant and similar to the Project.

(h) Land Use and Planning

As land use impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 7 apply to both the Project and the Project with the East Site Hotel Option.

Alternative 7 proposes to develop up to 1,094,720 square feet of office and retail/restaurant floor area, with an approximate FAR of 6.017:1 and 24,900 square feet of publicly accessible open space. The Project proposes up to 1,287,150 square feet of residential and commercial floor area with an approximate FAR of 6.973:1.[77] As with the Project, to allow for development of Alternative 7, the zoning would be amended to C2-2-SN to eliminate the D Limitation, which limits FAR to 3:1 and 2:1 on certain parcels. As with the Project, Alternative 7 would require a Conditional Use Permit to allow FAR averaging to be calculated as a whole rather than by individual parcel or lot. As with the Project, Alternative 7 would not conflict with applicable 2016-2040 RTP/SCS goals to facilitate land use patterns that link land use and sustainable transportation options or the Framework Element Regional Center designation and policies that support a diversity of land uses, and provide for the spatial distribution of development that promotes a reduction of vehicle trips, VMT, and air pollution. Although Alternative 7 would not further regional and local policies to provide housing as under the Project, the overall density and location of Alternative 7, as with the Project, would not conflict with policies of local and regional land use plans adopted to avoid or mitigate environmental effects. Therefore, impacts with respect to land use would be less than significant under Alternative 7 and similar to the Project.

(i) Noise

Maximum daily construction noise and vibration levels would be similar under the Project and the Project with the East Site Hotel Option. While the Project and the Project with the East Site Hotel Option would have nominally different daily operational mobile source noise levels, the impact conclusions, significance levels, and mitigation measures are the same for the Project and the Project with the East Site Hotel Option. Accordingly, the below comparisons of impacts of Alternative 7 apply to both the Project and the Project with the East Site Hotel Option.

77 The Project with the East Site Hotel Option would provide 1,277,741 square feet of total floor area.

(i) Noise Levels in Excess of Standards

(a) Construction

As with the Project, Alternative 7 would involve site clearance and preparation, excavation, and construction activities. The use of heavy duty machinery or combined machinery required for the construction phases would increase noise levels at several sensitive receptor locations in the area. As with the Project, because the maximum amount of construction equipment operating simultaneously within the Project Site would be constrained by the size of the property, the maximum construction noise levels under Alternative 7 would be similar to the Project. Based on a conservative impact analysis, in which noise levels were calculated with all pieces of construction equipment operating simultaneously and located at the construction area nearest to the affected receptors, construction noise levels would exceed the applicable noise significance thresholds at several nearby noise sensitive receptors. Therefore, as with the Project, Alternative 7 would implement Mitigation Measures NOI-MM-1 to NOI-MM-3 to reduce construction noise impacts at off-site noise sensitive receptors to the extent technically feasible. However, as with the Project, with implementation of technically feasible mitigation, construction noise impacts at noise-sensitive receptors 1, 3, and 5 through 13 (eleven sites) would still exceed the significance threshold under Alternative 7. Therefore, as with the Project, construction noise impacts associated with on-site noise sources would remain temporarily significant and unavoidable for Alternative 7. Similar to the Project, maximum construction traffic would not result in significant noise levels (greater than 5 dBA L_{eq}) compared to existing traffic noise levels along any of the studied roadway segments, and impacts would be less than significant. Although construction noise levels associated with on-site noise sources would be significant and unavoidable under Alternative 7, Alternative 7 would have a shorter overall construction due to its reduced scale of development. As such, impacts related to construction noise under Alternative 7 would be less than the Project.

(b) Operation

Alternative 7, as with the Project, would increase off-site traffic and generate on-site composite noise associated with fixed equipment, vehicle activity, and human outdoor activity. However, Alternative 7 would increase the Project's daily vehicle trips from a maximum of 4,504 (Project with East Site Hotel Option) to 6,324 under Alternative 7 (an approximately 40-percent increase); therefore, operational mobile source noise impacts would be greater under Alternative 7 than the Project with the East Site Hotel Option.[78] It is acknowledged that differences in off-site mobile source noise level increases along the studied roadway segments under the Project and the Project with the East Site Hotel Option would be negligible and

78 Fehr and Peers, Alternatives Transportation Analysis, March 2020, Appendix Q of this Draft EIR.

less than 0.1 dBA CNEL for all analyzed roadway segments. Assuming a 40-percent increase in Alternative 7-related daily vehicle trips on the analyzed roadway segments, compared to the Project with the East Site Hotel Option, the maximum increase in Alternative 7-related traffic noise levels over Future (2040) traffic noise levels would be approximately 0.9 dBA CNEL (from 63.9 to 64.8 dBA CNEL) along Ivar Avenue between Hollywood Boulevard and Selma Avenue and would not exceed the significance threshold of a 5 dBA CNEL. Comparatively, the Project with the East Site Hotel Option (or the Project) would result in a 0.6 dBA increase along this same roadway segment in 2040. This difference in mobile source noise would not be perceptible, and, as such, traffic noise impacts under Alternative 7 would be less than significant and similar to the Project.

Alternative 7 would also include a paseo that could host events of a similar type and size as the Project. As such, noise generated from the paseo under Alternative 7 would be similar to the Project. Similar to the Project, any outdoor performances under Alternative 7 would be subject the noise restrictions in NOI-PDF-3, which would limit noise levels from adversely affecting nearby noise sensitive receptors. Thus, noise, in general, generated from the paseo under Alternative 7 at off-site noise sensitive locations would be largely similar to the Project with the outdoor performance sound restrictions in place. As such, noise generated from the paseo under Alternative 7 would be similar or less than the Project when considering no on-site residents would attend these events under Alternative 7. Overall, composite operational noise levels would be less than significant and similar to the Project.

(ii) Groundborne Noise and Vibration

(a) Construction

Construction of Alternative 7, as with the Project, would generate groundborne construction vibration during construction activities when heavy construction equipment is used. As with the Project, the estimated vibration velocity levels from all construction equipment (maximum construction conditions) under Alternative 7 would be below the building damage significance criteria at off-site building structures west and east of the West Site and East Site construction areas. However, as with the Project, the estimated construction vibration levels under Alternative 7 would exceed the significance threshold at the Avalon Hollywood, the Pantages Theatre, the Yucca Street Art Deco Building Storefront, the AMDA Vine building, the Argyle House, the Commercial Building at 1718 Vine Street, the Capitol Records Building, and the Gogerty Building. Therefore, vibration impacts pursuant to the significance criteria for building damage would be significant. As with the Project, with implementation of Mitigation Measure NOI-MM-4 and compliance with LAMC Section 91.3307.1, vibration impacts associated with Alternative 7 would be reduced to less-than-significant levels for the Capitol Records and Gogerty Buildings. However, similar to the Project, because consent of off-site property owners, who may not agree, would be required to implement

the vibration mitigation for potential structural damage to their off-site structures, it is conservatively concluded that structural vibration impacts on the AMDA Vine Building, the Argyle House, the Commercial Building at 1718 Vine Street, the Pantages Theatre, Avalon Hollywood, and Art Deco Building Storefront would remain significant and unavoidable because it cannot be assured that all components of NOI-MM-4 can be implemented.

Regarding human annoyance, as with the Project, the estimated vibration levels due to maximum construction activity at the West Site under Alternative 7, would exceed the significance threshold for human annoyance at vibration sensitive receptors near the Project Site. Implementation of Mitigation Measure NOI-MM-4, under Alternative 7, as with the Project, may lessen but would not reduce all human annoyance impacts to a less-than-significant level. Therefore, as with the Project, no feasible mitigation measures under Alternative 7 would reduce the temporary vibration impacts from on-site construction associated with human annoyance at the vibration-sensitive receptors 3, 5, 6, and 8 through 13. As with the Project, construction vibration levels would be significant and unavoidable under Alternative 7. However, because the overall scale of development would be reduced by approximately 14.9 percent under Alternative 7, the duration of construction and overall construction activity causing vibration would be less, and impacts under Alternative 7 would be less than the Project.

(b) Operation

Day-to-day operations under Alternative 7, as with the Project, would include typical commercial-grade stationary mechanical and electrical equipment, which would produce vibration at low levels that would not cause damage or annoyance impacts to on-site or off-site environment. Primary sources of transient vibration would include vehicle circulation within the proposed parking areas, which would be confined to the immediate area and would not be expected to be perceptible off the Project Site. It is anticipated that mechanical equipment, including air handling units, condenser units, and exhaust fans, under Alternative 7, as with the Project, would be located on building rooftops. Therefore, as with the Project, groundborne vibration from the operation of such mechanical equipment under Alternative 7 would not impact any of the off-site sensitive receptors. Thus, similar to the Project, operational vibration impacts under Alternative 7 would be less than significant. While Alternative 7 would have different uses than the Project, off-site groundborne operation vibration is not anticipated to be perceptible under Alternative 7, and, such, impacts under Alternative 7 would be similar to the Project.

(j) Population and Housing

During operation, the Project and the Project with the East Site Hotel Option would have different population, housing, and employment generation statistics. However, both development scenarios would result in the same impact conclusions and impact significance levels. Accordingly, the below comparisons of

impacts of Alternative 7 apply to both the Project and the Project with the East Site Hotel Option.

Alternative 7 would provide 1,063,152 square feet of office floor area, which would generate approximately 4,582 new employees.[79] Alternative 7 would also incorporate 31,568 square feet of retail/restaurant use, which would generate a total of approximately 215 new employees.[80] The total gain in occupancy of the Project Site would be 4,797 employees. By comparison, the Project would include 30,176 square feet of retail/restaurant uses, which would generate approximately 206 employees. The Project with the East Site Hotel Option, based on 130,278 square feet of hotel floor area would also generate approximately 239 employees[81] and its retail/restaurant uses would generate approximately 206 new employees, for a total of approximately 445 employees. As with the Project, additional employees may be associated with on-site security and maintenance under Alternative 7.

Alternative 7, which would generate 4,797 employees would represent 3.27 percent of SCAG's 2018-2027 employment growth projection of 146,255 and percent of SCAG's 2019-2040 employment growth projection of 320,375. As with the Project, Alternative 7 would concentrate large scale development within a TPA and provide the type of transit oriented development encouraged in the General Plan and SCAG 2016-2040 RTP/SCS policies. However, without a residential component, Alternative 7 would not advance local and regional planning objectives that promote infill development that support and provide a mix of uses in urban centers near public transit. Also, Alternative 7 would not assist the City in meeting its housing obligation under SCAG's RHNA allocation. Although SCAG population and housing projections would not be exceeded and no displacement would occur, because no housing is provided, Alternative 7 could result in the indirect need for new housing to be constructed elsewhere. This could generate potential environmental impacts associated with construction activity at other locations. Although Alternative 7's growth in employment would not exceed SCAG's employment growth projections and would be less than significant, impacts related to population and housing would be greater under Alternative 7 than the Project.

(k) Public Services

During operation, the Project and the Project with the East Site Hotel Option would have different service-related population statistics, such as number of residents or students. However, both development scenarios would result in the same impact

79 Based on LAUSD employee generation rate of 0.00431 per square foot of high rise office uses.

80 Based on HR&A Economic and Fiscal Impact Report evaluation in which the factor for the Project's retail/restaurant uses would be one employee per 147.2 square feet of floor area.

81 Based on HR&A Economic and Fiscal Impact Report evaluation in which the factor for the Project's retail/restaurant uses would be one employee per 545 square feet of hotel floor area.

conclusions and impact significance levels. Accordingly, the below comparisons of impacts of Alternative 7 apply to both the Project and the Project with the East Site Hotel Option

(i) Fire Protection

Alternative 7, as with the Project, would involve construction activities and intensify the use of the Project Site so that it would increase demand on fire protection and emergency medical services, as well as potentially reduce emergency access. Alternative 7, as with the Project, would incorporate Project Design Feature TRAF-PDF-2 to provide a Construction Traffic Management Plan to improve vehicular access around the construction site. Project Design Feature TRAF-PDF-3 would identify and enforce parking location requirements for construction workers. The implementation of these Project Design Features would facilitate emergency access. As such, similar to the Project, construction under Alternative 7 would result in less-than-significant impacts with respect to emergency response times and emergency access.

During operation, Alternative 7 would generate 4,797 new employees, with no increase in residential population. The Project would result in a population increase of 2,433 persons and 206 new employees.[82] The Project with the East Site Hotel Option would result in a population increase of 2,140 persons and 445 employees. As with the Project, Alternative 7 would comply with the applicable OSHA, Building Code, Fire Code, other LAMC, and LAFD requirements and recommendations, which would reduce demand on LAFD facilities and equipment without creating the need for new or expanded fire facilities. In addition, the Project Site is located within a highly urbanized area accessed via an established street system and within the LAFD's maximum prescribed response distances. Due to urban proximity and facilitated travel for high priority emergency calls, impacts on emergency response would not be significant. As with the Project, Alternative 7 would also be consistent with LAMC fire flow requirements. As such, as with the Project, Alternative 7 would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. Impacts under Alternative 7, as with the Project, would be less than significant. However, because of the increase in Project Site occupancy under Alternative 7, impacts related to fire protection services under Alternative 7 would be greater than the Project.

(ii) Police Protection

Alternative 7, as with the Project, would result in construction and operation activities that could affect emergency access and increase demand for police

82 Based on Citywide occupancy of 2.34 resident per household and LAUSD employee factors of 0.00431 employee per square foot of high rise office uses.

protection services. As with the Project, Alternative 7's construction phase, although of shorter duration than that of the Project, could increase potential demand for LAPD services related to theft or vandalism and increased worker activity, as well as construction traffic that could affect emergency response times. To reduce LAPD demand during construction, Alternative 7, as with the Project, would implement a number of security measures under Project Design Feature POL-PDF-1 to limit access to construction areas, including private security, construction fencing, and locked entry. Similar to the Project, construction activities under Alternative 7 may involve temporary lane closures or increase travel time due to flagging or stopping traffic to accommodate trucks entering and exiting the Project Site. Under Project Design Feature TRAF-PDF-2, a Construction Traffic Management Plan would ensure that adequate and safe access remains available at the Project Site during construction activities. Project Design Feature TRAF-PDF-3 would implement a Construction Worker Parking Plan to identify and enforce parking location requirements for construction workers. As with the Project, most construction staging for Alternative 7 would occur on the Project Site, and construction workers would generally start and end their work days in advance of peak traffic hours, thus, reducing their potential effect on traffic and emergency response times. Furthermore, construction-related traffic generated by Alternative 7, as with the Project, would not significantly impact LAPD response times within the Project vicinity as LAPD vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic during construction.

According to LAPD service population generation factors,[83] Alternative 7's 1,063,152 square feet of office floor area and 31,568 square feet of retail/restaurant floor area would generate a total of 3,285 persons (based on a total of 1,094,720 square feet of commercial uses). As discussed in Section IV.K.2, *Police Protection*, LAPD does not provide crime rates for non-resident population. However, the analysis of impacts to police services, to be conservative, evaluates the residential and non-residential populations as requiring police protection services. Thus, the analysis utilizes a generation factor of 15 crimes per 1,000 service population to determine the number of crimes potentially occurring as part of the Project. Utilizing this same methodology and crime factors as for the Project, the increase in service population (i.e., employees and residents) generated by Alternative 7 could result in 50 crimes per year.[84] In comparison the Project and the Project with the East Site Hotel Option would result in 49 and 48 crimes per year, respectively.

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83 LAPD service population generation factors for commercial uses is 3 residents per 1,000 sf of commercial floor area.

84 Crime total rounded up to next whole number.[85] For the restaurant/retail uses, the student generation rate of 0.610 student per 1,000 square feet is based on the Neighborhood Shopping Centers rate as provided in Table 15 of the LAUSD 2018 Developer Fee Justification Study. The students are distributed as follows: 54 percent elementary school, 15 percent middle school, and 31 percent high school.

The LAPD determines the need for new officers based on a variety of non-definitive factors (i.e., shifts in station and/or patrol boundaries, ongoing staff changes, service populations and crime statistics may be considered when new officers are hired). Alternative 7, as with the Project, would incorporate Project Design Feature POL-PDF-2 to provide a 24-hour/seven-day security program to ensure the safety of its employees and site visitors. These measures would reduce demand on police services during operation. Similar to the Project, with the implementation of these features, Alternative 7 would not increase police services demand to the extent that the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, Alternative 7, as with the Project, would not result in potential physical impacts associated with construction of police facilities and impacts with respect to police protection would be less than significant. However, as crime rates would be substantially similar, impacts to police protection services under Alternative 7 would be similar to the Project.

(iii) Schools

Alternative 7 would not include any residential uses. However, LAUSD does have student generate rates for office and commercial uses within their 2018 Developer Fee Justification Study. Based on these rates, Alternative 7 would generate approximately 568 elementary school students, 158 middle school students, and 326 high school students totaling 1,052 students.[85,86] In contrast, the Project and the Project with the East Site Hotel Option would generate 441 students and 424 students, respectively. Similar to the Project, the additional students under Alternative 7 could potentially exceed the number of seats available at local schools. However, pursuant to Section 65995 of the California Government Code, the Project Applicant would be required to pay fees in accordance with SB 50. Payment of such fees is intended for the general purpose of addressing the construction of new school facilities, whether schools serving the Project are at capacity or not and, pursuant to Section 65995(h), payment of such fees is deemed to be full mitigation of a project's development impacts. As such, impacts to school facilities and services under Alternative 7 would, as with the Project, would be less than significant. However, because Alternative 7 would generate more school-age children than the Project based on LAUSD student generation rates, impacts on schools would be greater than the Project.

85 For the restaurant/retail uses, the student generation rate of 0.610 student per 1,000 square feet is based on the Neighborhood Shopping Centers rate as provided in Table 15 of the LAUSD 2018 Developer Fee Justification Study. The students are distributed as follows: 54 percent elementary school, 15 percent middle school, and 31 percent high school.

86 For the office uses, the student generation rate of 0.969 student per 1,000 square foot is based on the Large High Rise Commercial Office rate Table 15 of the LAUSD 2018 Developer Fee Justification Study. The students are distributed as follows: 54 percent elementary school, 15 percent middle school, and 31 percent high school.

(iv) Parks and Recreation

Alternative 7 would not result in an increase in residential population but would generate approximately 4,797 new employees. As a non-residential use, Alternative 7 would have only a minor impact on local public parks and recreation facilities. A few of Alternative 7's employees could have an interest in visiting local parks and recreation facilities. This would not occur to a level that would impact the capacity of parks and recreation facilities in the area, compared to a respective residential use, such as the Project. In contrast, the Project and the Project with the East Site Hotel Option would generate approximately 2,433 new residents and 2,140 residents, respectively. Similar to the Project, operation of Alternative 7 would not exacerbate the existing shortfalls in parkland relative to City standards to the extent that new or physically altered park or recreational facilities would need to be constructed, the construction of which would cause significant adverse physical environmental impacts. As with the Project, impacts with respect to parks and recreation would be less than significant under Alternative 7. However, since Alternative 7 would not result in a residential population gain, it would have less demand for parks and recreation facilities, and impacts would be less than the Project

(v) Libraries

Alternative 7 would not result in an increase in residential population but would generate approximately 4,797 new employees. As a non-residential use, Alternative 7 would have only a minor impact on local public libraries. A few of Alternative 7's employees could have an interest in visiting local libraries or using library services. This would not occur to a level that would impact the capacity of libraries in the area, compared to a respective residential use, such as the Project. The LAPL has indicated they have no plans for a new branch library in the Project vicinity. As with the Project, there are also three libraries within one-mile of the of the Project Site which could serve Alternative 7 or the Project. Furthermore, in consideration of the Alternative 7's ability to provide internet service, generate revenue to the City's General Fund, and LAPL's ongoing expansion and availability of online resources, similar to the Project, Alternative 7's increase in demand to any one local library would not be expected to result in a substantial increase in demand that would necessitate new or physically altered facilities. Therefore, similar to the Project, Alternative 7 would not create the need for new or physically altered library facilities, the construction of which would result in substantial adverse physical environmental impacts, in order to maintain acceptable service ratios or objectives. Therefore, as with the Project, impacts to libraries under Alternative 7 would be less than significant. However, because Alternative 7 would not result in a residential population gain, impacts with respect to libraries would be less than the Project.

(l) Transportation

During operation, the Project and the Project with the East Site Hotel Option would have different overall VMT and VMT per capita statistics. However, both development scenarios would result in the same transportation-related impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of Alternative 7 apply to both the Project and the Project with the East Site Hotel Option.

(i) Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities

Alternative 7, as with the Project, would support multimodal transportation options and a reduction in VMT, as well as promote transportation-related safety in the Project area. Alternative 7, as with the Project, would not conflict with policies of Mobility Plan 2035 and the City of Los Angeles Complete Streets Design Guide, adopted to protect the environment and reduce VMT. Similar to the Project, Alternative 7 would also be consistent with applicable transportation goals of the Hollywood Community Plan and the Hollywood Redevelopment Plan. Project Design Feature TRAF-PDF-1 under Alternative 7, as well as the Project, would implement a TDM Program to address parking, transit, commute trip reductions, shared mobility, bicycle use, and pedestrian access, and TDM management strategies. TDM measures to promote bicycle use include bicycle parking spaces, bike lockers, and showers for residents, employees, and visitors. Alternative 7, as with the Project, would not conflict with VisionZero to reduce traffic-related deaths; with LAMC Section 12.37 regarding street standards; with LADOT MPP, Section 321, regarding driveway design standards, or with the 1988 Hollywood Community Plan's Objective 6 to coordinate land use densities and to promote the use of transit. Alternative 7, as with the Project, would increase population density in close proximity to the Metro Red Line Hollywood/Vine Station, other regional Metro bus lines, and the LADOT DASH lines. Alternative 7, as with the Project, would also provide for road and pedestrian improvements, including a paseo linking the West Site and East Site and new median improvements along Vine Street, which would enhance pedestrian safety. A signalized mid-block crosswalk is proposed across Argyle Avenue to help facilitate local pedestrian circulation and access by maintaining a path of east-west travel with the existing mid-block crosswalks across Ivar Avenue and Vine Street. However, under Alternative 7, the paseo on the East Site would not continue through the Project linking Argyle Avenue to Vine Street. Thus, less pedestrian connectivity through the Project Site linking it to surrounding uses would occur under Alternative 7. Similar to the Project, Alternative 7 would not conflict with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, and, as such, impacts relative to plans and programs would

be less than significant. However, due to decreased pedestrian access and connectivity through the Project Site, impacts under Alternative 7 would be greater than the Project.

(ii) Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)

As required under CEQA Guidelines Section 15064.3(b) and based on proposed land uses, floor areas, TDM measures incorporated under Project Design Feature TRAF-PDF-1 (Transportation Demand Management Program), VMT standards would be applicable to Alternative 7, as well as the Project. Alternative 7 would have a work VMT of 4.5 per employee (the household per capita fee would not be applicable).[87] The Project would have a household per capita VMT of 4.8 and is exempt from retail VMT. The Project with the East Site Hotel Option would have a work VMT of 4.8 and a household VMT of 4.7 per capita. These rates are all below the thresholds of significance proposed for the City's Central APC household per capita of 6.0 and work VMT of 7.6. per employee. Thus, similar to the Project, impacts under Alternative 7 would be less than significant. While the comparative worker VMT are below the APC thresholds, Alternative 7's work VMT per capita is lower than the Project's and as such, impacts with respect to CEQA Guidelines Section 15064(b) are considered to be less than the Project.

(iii) Design Hazards

Alternative 7, as with the Project, would reduce existing curb cuts and provide new sidewalks around the perimeter of the Project Site. As with the Project, improvements under Alternative 7 would include a signalized mid-block crosswalk provided across Argyle Avenue to help facilitate local pedestrian circulation and access. As with the Project, Alternative 7 would provide a paseo, but it would not connect Vine Street to Argyle Avenue. However, this design difference would not lead to hazards. Alternative 7, as with the Project, would eliminate driveway crossings on Vine Street. Access to the Capitol Records Complex (including both the Capitol Records Building and the Gogerty Building) would continue to be provided via the existing driveway on Yucca Street. Similar to the Project, total existing curb cuts would be reduced from 12 total to a total of five. The driveways would not require the removal or relocation of existing passenger transit stops, and would be designed and configured to avoid potential conflicts with transit services and pedestrian traffic. Alternative 7, as with the Project, would not substantially increase hazards, vehicle/pedestrian conflict, or preclude City action to fulfill or implement projects associated with these networks. Similar to the Project, Alternative 7 would contribute to overall walkability through enhancements to the Project Site, streetscape, and crossing of Argyle Avenue, and would not substantially increase geometric hazards due to a design feature (e.g., sharp

87 Fehr and Peers, Alternatives Transportation Analysis, March 2020, Appendix R of this Draft EIR.

curves or dangerous intersections) or incompatible uses. Impacts under Alternative 7 would be less than significant and similar to the Project.

(iv) Emergency Access

The Project Site is located in an established urban area served by the surrounding roadway network, and multiple routes exist in the area for emergency vehicles and evacuation. Drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Similar to the Project, no policy or procedural changes to an existing risk management plan, emergency response plan, or evacuation plan would be required due to implementation under Alternative 7. All driveways and the internal circulation would be subject to LAFD review to confirm adequate access is provided internally for on-site emergency vehicle access. With review and approval of Project Site access and circulation plans by the LAFD, Alternative 7, as with the Project, would not impair implementation of or physically interfere with adopted emergency response or emergency evacuation plans. Impacts regarding emergency access under Alternative 7 would be less than significant and similar to the Project.

(m) Tribal Cultural Resources

As tribal cultural resources impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparison of impacts of Alternative 7 apply to both the Project and the Project with the East Site Hotel Option.

The City complied with AB 52 in its consultation and records searches conducted through SCCIC and the NAHC for the Archaeological and Paleontological Resources Assessment. The research indicated no known tribal cultural resources within the Project Site or surrounding area. However, as with the Project excavations associated with Alternative 7 could have a potential, albeit a low potential, to encounter previously unknown and buried tribal cultural resources. However, similar to the Project, in the event that buried tribal cultural resources are encountered during construction of Alternative 7, the Project Applicant will be required to comply with the City's standard Conditions of Approval for the treatment of inadvertent Tribal cultural resource discoveries. With compliance, Alternative 7, as with the Project, would result in less-than-significant impacts to tribal cultural resources. As excavation depths would be less, impacts to tribal cultural resources under Alternative 7 would be less than the Project

(n) Utilities and Service Systems – Water, Wastewater, and Solid Waste

During operation, the Project and the Project with the East Site Hotel Option would have different utility demand statistics (i.e., water demand, wastewater generation, and solid waste generation). However, both development scenarios would result

in the same impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of Alternative 7 apply to both the Project and the Project with the East Site Hotel Option.

(i) Wastewater

Alternative 7 would generate additional wastewater and increase demand on the existing Hyperion Treatment Conveyance System and Hyperion Treatment Plant. **Table V-12**, *Alternative 7 Wastewater Generation During Operation*, summarizes Alternative 7's approximate wastewater generation.

TABLE V-12
ALTERNATIVE 7 WASTEWATER GENERATION DURING OPERATION

Land Use	Units	Generation Rate (gpd/unit)[a]	Total Wastewater Generation (gpd)
Office	1,063,152 sf	0.17/sf	180,736
Retail/Restaurant Lobbies	16,248 sf	50/1,000 sf	844
Retail/Restaurant: Full Service Indoor Seating[b]	1,289 seats[c]	30/seat	38,670
Cooling Towers	7,971 sf	170/1,000 sf	1,355
		Total	**221,605 gpd**

Acronyms: du = dwelling units; sf = square feet, gpd = gallons per day, cf = cubic feet

[a] The generation rates are based on the LASAN sewerage generation factors.

[b] To calculate the number of seats, 1 seat per 15 sf of dining area (or 1 seat per approximately 24.49 sf) was assumed. To be conservative, the calculation assumes the Alternative's entire retail/restaurant floor area of 31,568 sf would be restaurant uses.

SOURCE: ESA, 2020

As shown in Table V-12, Alternative 7 is estimated to generate approximately 221,605 gpd, or approximately 0.2216 mgd based on 1,063,152 square feet of offices, 31,568 square feet of retail and restaurant uses, and water tower. The Project is estimated to increase on-site wastewater generation by 311,680 gallons per day gpd, or approximately 0.312 mgd and the Project with the East Site Hotel Option is anticipated to generate 322,067 gpd, or approximately 0.322 mgd. These estimates do not account for reductions in wastewater generation that would occur with implementation of conservation measures. Similar to the Project, the increase in wastewater generation by Alternative 7 would be within the capacity limits of the conveyance and treatment facilities serving the Project Site. Similar to the Project, impacts on wastewater conveyance and treatment systems under Alternative 7 would be less than significant. However, because Alternative 7 would generate a lower volume of wastewater, impacts under Alternative 7 would be less than the Project.

(i) Water Supply

Alternative 7 would increase demand on water supplies and infrastructure. Based on wastewater generation factors shown in Table V-12, commercial uses provided under Alternative 7 would generate a water demand of 221,605 gpd. Additional water would be required for landscaping and indoor parking structure space. As under the Project, landscaping would require approximately 2,227 gpd. Parking would increase from approximately 1,521 spaces under the Project to 2,745 spaces under Alternative 7. As such, when compared to the Project, parking space water demand is expected to increase from 445 gpd to approximately 643 gpd (an increase of approximately 44.5 percent). Alternative 7's water demand is estimated to be 224,475 gpd prior to water conservation measures. Water conservation measures under the City's Ordinance No. 184,248, the 2017 Los Angeles Plumbing Code, and the 2017 Los Angeles Green Building Code, and incorporation of the Applicant's water conservation efforts and Project Design Feature WS-PDF-1 would result in a savings of approximately 39 percent (as assumed for the Project as well), which would reduce water demand under Alternative 7 to approximately 136,929.75 gpd (~153.48 afy). In comparison, the Water Supply Assessment for the Hollywood Center Project indicated the Project and the Project with the East Site Hotel Option would have a water demand of 163,098 gpd (~183 afy) and 182,896 gpd (~205 afy), respectively, accounting for water conservations and compliance with applicable regulations.[88] Similar to the Project, Alternative 7's water demand projections would be within LADWP's 2015 UWMP's projected increases in Citywide water demands, while anticipating multi-dry year water conditions through the planning horizon of 2040.

Furthermore, similar to the Project, operation of Alternative 7 would require new connections from existing facilities. With regulatory compliance to the LAMC and coordination with LADWP, operation of Alternative 7, as with the Project, would not result in the relocation or construction of new or expanded water facilities, the construction or relocation of which would cause significant environmental effects. Similar to the Project, operational impacts on water infrastructure under Alternative 7 would be less than significant.

Based on the above, while Alternative 7 and the Project would result in less than significant water supply and infrastructure impacts, because Alternative 7 would result in less water demand compared to the Project, impacts would be less under Alternative 7 than the Project.

(ii) Solid Waste

Alternative 7, as with the Project, would increase solid waste generation at the Project Site that would need to be landfilled. The construction of Alternative 7

88 LADWP, WSA for the Hollywood Center Project, December 11, 2018, pp. 11 and 12. Provided in Appendix P-2 of this Draft EIR.

would generate less construction waste due the approximately 14.9 percent reduction in total floor area (1,084,730 square feet under Alternative 7 compared to 1,287,149 square feet under the Project). The maximum construction waste under the Project would represent a small fraction of the available capacity of the County's Azusa Land Reclamation landfill or one of the inert debris engineered fill operations in Los Angeles County. As such, impacts associated with construction under the Project and Alternative 7 would be less than significant. However, because construction materials would be less under Alternative 7, it would have less impact with respect to construction waste than the Project.

During operation, Alternative 7's 4,797 employees would generate approximately 50,512 pounds of solid waste per day (based on 10.53 pounds per day per employee) or approximately 9,218 tons per year. After implementation of the City's 65-percent diversion rate, Alternative 7 would generate approximately 3,226 tons per year (8.84 tpd) requiring landfill disposal per year. The Sunshine Canyon Landfill, the primary recipient of Class III solid waste from the City, has a maximum daily capacity of 12,100 tpd and a disposal rate of 6,765 tpd, indicating a residual daily capacity of 5,335 tpd. Alternative 7's addition of 10.34 tpd[89] landfill disposal rate would represent 0.19 percent of Sunshine Canyon's residual daily capacity, assuming diversion.

By comparison, the Project, which would have a higher disposal rate than the Project with the East Site Hotel Option, would generate approximately 2,639 tons of solid waste requiring landfill disposal per year and approximately 7.23 tons of solid waste per day. After implementation of the City's 65-percent diversion rate, the Project would generate approximately 923.65 tons of solid waste per year or 2.53 tons of solid waste per day, which would be 2.96 tpd landfill disposal rate.

Similar to the Project, Alternative 7's additional solid waste generation would be accommodated by the County's City-certified waste processing facilities. As with the Project, Alternative 7's 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. Similar to the Project, impacts with respect to solid waste under Alternative 7 would be less than significant. However, because Alternative 7 would increase solid waste compared to the Project, impacts under Alternative 7 would be greater than the Project.

(o) Energy Conservation and Infrastructure

During operation, the Project and the Project with the East Site Hotel Option would have different energy consumption statistics. However, both development scenarios would result in the same impact conclusions and impact significance

89 Alternative 7's daily disposal in tons assumes that landfills operate six days per week; 52 weeks * 6 days = 312 days. Therefore, the daily disposal is calculated by 3,226 tons / 312 days = 10.34 tpd.

levels. Accordingly, the below comparisons of impacts of Alternative 7 apply to both the Project and the Project with the East Site Hotel Option.

(i) Efficient Energy Consumption

Alternative 7, as with the Project would incorporate energy-conservation measures beyond regulatory requirements as specified in Project Design Features GHG-PDF-1 and WS-PDF-1, as applicable to commercial uses. These require USGBC LEED Gold Certification energy performance optimization features such as reducing building energy cost by a minimum of 11.6 percent for new construction compared to the 2019 Title 24 Building Energy Efficiency Standards and installing energy efficient appliances. As with the Project, Alternative 7 would comply with and exceed existing minimum energy efficiency requirements such as the Title 24 standards and CALGreenCode, including for building rooftops to be solar-ready so that on-site solar photovoltaic or solar water heating systems could be installed in the future. Alternative 7, as with the Project, would be designed to exceed ASHRAE 90.1-2010 standards by more than 20 percent through the use of efficient heating, ventilation, and HVAC systems and a high-performance building envelope. Indoor air quality would be enhanced through the selection of low-VOC emitting materials, and exhaust systems would be utilized for optimal ventilation in both kitchens and bathrooms. Alternative 7, as with the Project, would meet the requirements of the Los Angeles Green Building Code and the CALGreen Code regarding on-site renewable energy sources.

Alternative 7, as with the Project, would be consistent with and not conflict with SCAG's land use type for the area and would encourage alternative transportation, and achieve a reduction in VMT resulting in a transportation efficiency level better than the Hollywood neighborhood and City and statewide average.

Based on energy consumption modeling for Alternative 7, natural gas usage in Alternative 7 would be approximately 3 percent higher and approximately 8 percent less when compared to the Project and the Project with the East Site Hotel Option, respectively.[90] Electricity usage would be approximately 95 percent higher and approximately 105 percent higher when compared to the Project and the Project with the East Site Hotel Option, respectively. Despite the differences in energy consumption, Alternative 7, as with the Project, would not cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation, and, as such, impacts related to efficient energy consumption would be less than significant. As both would similarly comply to applicable efficient energy consumption regulations, impacts under Alternative 7 would be similar to the Project.

90 Refer to Appendix R, Alternative Analyses, for CalEEMod operational energy demand worksheets for Alternative 7.

(ii) Conflict with Plans for Renewable Energy or Energy Efficiency

As with the Project, Alternative 7 would comply with existing energy standards, would include a project design and building operation that would incorporate energy-conservation measures beyond those otherwise required, and would not conflict with adopted energy conservation plans. Alternative 7, as with the Project, would be designed to meet the USGBC LEED Gold Certification including energy performance optimization features, such as reducing building energy demand by a minimum of 11.6 percent for new construction compared to the 2019 Title 24 Building Energy Efficiency Standards. Among other features it would install energy efficient appliances that meet the USEPA ENERGY STAR rating standards or equivalent; incorporate heat island reduction strategies, such as high-reflectance and vegetated roofs for the Project roof areas; provide water efficient fixtures and landscaping to reduce indoor water usage; and provide an HVAC system that would be sized and designed in compliance with the CALGreen Code to maximize energy efficiency caused by heat loss and heat gain. Alternative 7, as with the Project, would have the same automobile fuel efficiencies associated with access to alternative modes of transportation.

By exceeding the regulatory standards, similar to the Project, Alternative 7 would have a less-than-significant impact regarding the provisions of plans for renewable energy and energy efficiency. As Alternative 7 would be in compliance with plans for renewable energy and energy efficiency, impacts under Alternative 7 would be similar to the Project.

(iii) Relocation or Expansion of Energy Infrastructure

Alternative 7, as with the Project, would utilize energy infrastructure to accommodate their respective demand for energy resources. Similar to the Project, Alternative 7's electricity and natural gas demands are expected to represent a small fraction of LADWP and SoCalGas energy supplies and the service provider's existing infrastructure. As concluded in Section IV.O, *Energy Conservation and Infrastructure*, of this Draft EIR, planned electricity and natural gas supplies would be sufficient to meet the Project's demand for electricity and natural gas. As with the Project, Alternative 7 would not result in an increase in demand for electricity or natural gas services that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Similar to the Project, impacts with respect to the relocation or expansion of energy infrastructure under Alternative 7 would be less than significant. As off-site energy infrastructure would accommodate Alternative 7, impacts would be similar to the Project.

(3) Relationship of the Alternative to Project Objectives

As described above, Alternative 7, the Primarily Office Alternative, would consist of two office buildings containing ground-floor retail and restaurant uses. The buildings would rise to 27 stories on the West Site and 29 stories on the East Site. Proposed uses include 31,568 square feet of retail and restaurant uses. Alternative 7 would reduce the Project's total floor area by approximately 14.9 percent. Alternative 7 would include 24,900 square feet of publicly accessible open space; however, access to the paseo along Argyle Avenue would be eliminated as a parking structure is proposed along Argyle Avenue under this Alternative.

Alternative 7 would concentrate commercial development within the TPA, generate a high employment based, and be constructed in accordance with LEED-Gold equivalent standards. Therefore, Alternative 7 would fully meet the following objectives:

5. Promote local, regional, and State land use and mobility objectives and reduce vehicle miles traveled (VMT) by maximizing infill development within an existing Regional Center near jobs, retail, and entertainment in proximity to transit and transportation infrastructure that encourages pedestrian activity.

8. Support the growth of the City's economic base through the introduction of an economically viable project which creates a significant number of construction and permanent jobs.

10. Incorporate sustainable and green building design and construction to promote resource conservation, including waste reduction, efficient water management techniques, and conservation of energy to achieve a LEED-Gold equivalent building.

Alternative 7 would be comprised of a mix of commercial uses, which include office, retail and restaurant uses. In the absence of a residential component, Alternative 7 would not create the same range or mix of uses anticipated under the Project. In addition, Alternative 7 would require an above-grade parking structure because of the office component's high parking requirements. The parking structure would block the Project's paseo at Argyle Avenue, which would, in turn, block views of the Capitol Records Building from Argyle Avenue and the east. It would also reduce the Project's publicly accessible open space. As such, it would be only partially consistent with the following objectives:

1. Redevelop the Project Site, with a mixed-use development that protects the architectural and historical heritage of the Capitol Records Complex and activates Hollywood Boulevard, Vine Street, and surrounding streets through connected, publicly available landscaped open space, including a paseo with shopping, seating, open air dining, and art installations, and plazas accommodating performances and community focused events.

2. Create a hub of activity surrounding the Capitol Records Complex and the intersection of Hollywood Boulevard and Vine Street, by activating the eastern end of Hollywood Boulevard and the terminus of the Hollywood Walk of Fame, to increase engagement with the Capitol Records Complex.

3. Develop architecturally distinct buildings that are compatible with the Capitol Records Complex through a design that responds to the Capitol Records Building's modernist architectural character, and preserve views of the Capitol Records Building.

4. Maintain prominent views of the Capitol Records Building by providing building setbacks, visual buffers, open space between the Project's new buildings and the Capitol Records Complex, and safe public viewing areas from the proposed paseo and plazas, to maximize view corridors and continue showcasing its distinctive architectural design.

7. Cluster jobs and housing near transit by locating a high-density, mixed-use development within a Transit Priority Area.

9. Activate the Hollywood area with contemporary commercial opportunities that could serve local employees, generate local tax revenues, and provide new permanent jobs and housing for residents in support of local business.

As Alternative 7 would not incorporate senior affordable housing, it would not meet the following objective:

6. Provide affordable senior housing with outdoor spaces in proximity to public transportation, allowing an age-specific demographic to continue to live in their residence of preference while maintaining access to services and goods.

h) Alternative 8: Office, Residential and Commercial Alternative

(1) Description of the Alternative

The Office, Residential and Commercial Alternative (Alternative 8) would provide a mix of office, residential and commercial uses, with a total of 386,347 square feet of office uses and 27,140 square feet of commercial (i.e., restaurant and retail) uses distributed between the West and East Sites; and a total of 770 market-rate residential units and 133 senior affordable units, for a total of 903 residential units. Alternative 8 would include approximately 33,105 square feet of publicly accessible open space at the ground level, which includes a paseo through the East and West Sites, connecting Argyle Avenue to Ivar Avenue. The total new floor area for Alternative 8 would be 1,287,100 square feet, with an FAR of 6.973:1, the same as under the Project, although the total overall floor area for Alternative 8 would be 50 square feet less than the Project.

The West Site would be developed with two residential structures, as shown in **Figure V-19**, *Building Massing for Alternative 8*. The West Building, along Vine Street, would be 48 stories and reach a height of 545 feet at the top of the 48th story and 595 feet at the top of the bulkhead. The West Senior Building, at the southeast corner of Yucca Street and Ivar Avenue, would be 13 stories and reach a height of 169 feet at the top of the 13th story and 209 feet at the top of the bulkhead. The East Site would be developed with the East Office Building containing 386,347 square feet of office uses. The building would be 17 stories and reach a height of 317 feet at the top of the 17th story and 367 feet at the top of the bulkhead.

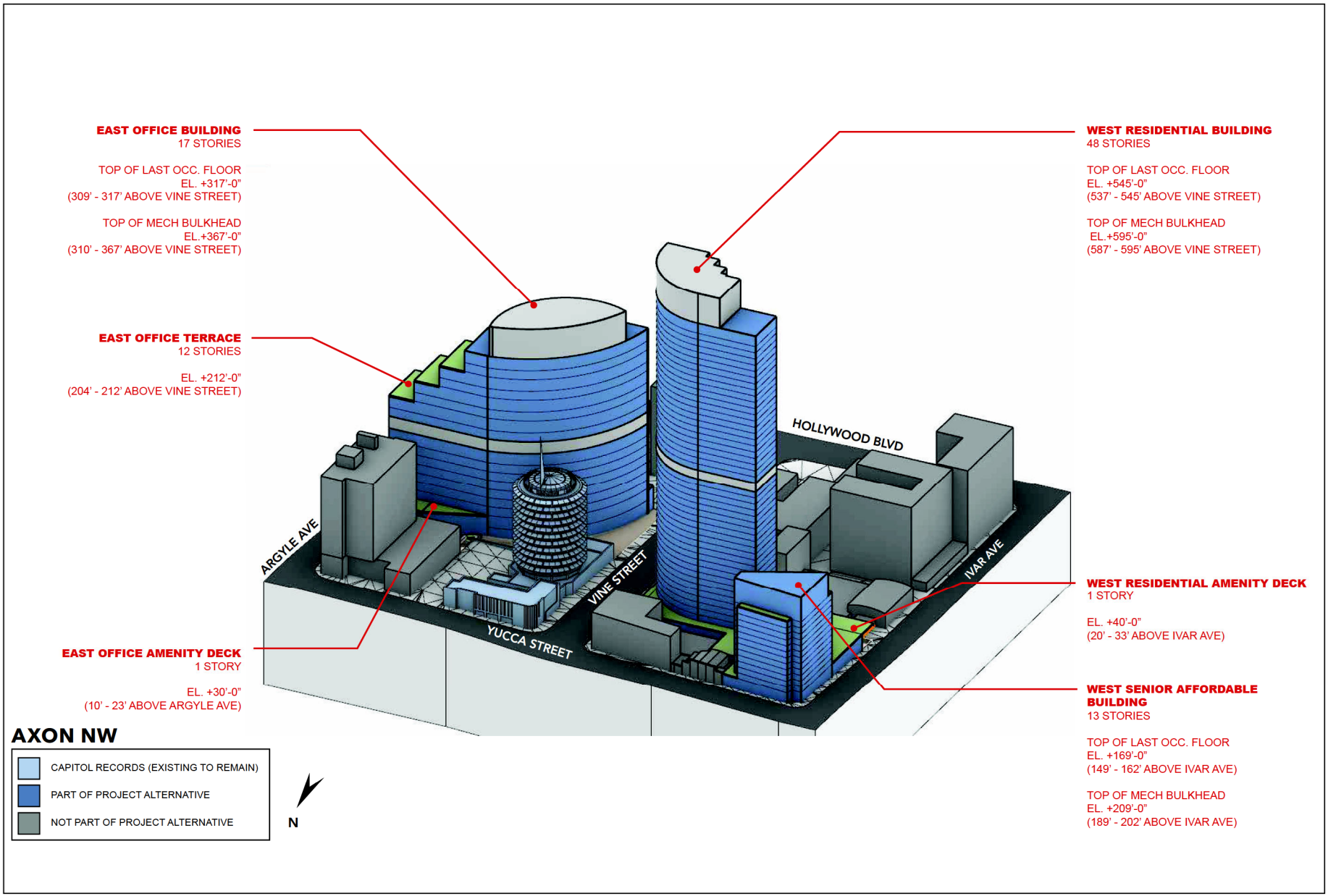
Figure V-20, *Alternative 8 Ground Floor Plan*, illustrates the ground floor plan, including Alternative 8's open space and commercial spaces. The commercial uses would be distributed between the East and West Sites, with a commercial space located at the ground floor on the corner of Yucca Street and Ivar Avenue and along Vine Street in the West Site, and along Argyle Avenue in the East Site. **Figure V-21**, *Alternative 8 Building Footprints*, illustrates the location of proposed buildings relative to the proposed ground level uses.

Under Alternative 8, a four-level subterranean parking structure containing a total of 1,134 spaces would be provided on the West Site; and a four-level subterranean parking structure containing 1,103 parking spaces would be provided on the East Site, for a total of 2,237 parking spaces.

Under Alternative 8, the proposed residential buildings on the West Site would incorporate LEED Gold Certification, as with the Project, and the proposed office building would combine LEED Platinum (the highest level of LEED Certification) and WELL Gold Certification.[91] Example LEED Platinum sustainability features include the following:

- 40-percent reduction in water consumption
- Low-flow bathroom fixtures
- Storm water collection and reuse
- Improved daylighting on office floors to maximize the reach of natural light into the floor plates
- Energy optimization through high-performance design
- Enhanced commissioning to ensure building systems are achieving their desired efficiency

91 The WELL Building Standard is a performance-based system for measuring, certifying, and monitoring features of the built environment that impact human health and wellbeing, through air, water, nourishment, light, fitness, comfort, and mind.



SOURCE: Handel Architects, 2020

Hollywood Center Project

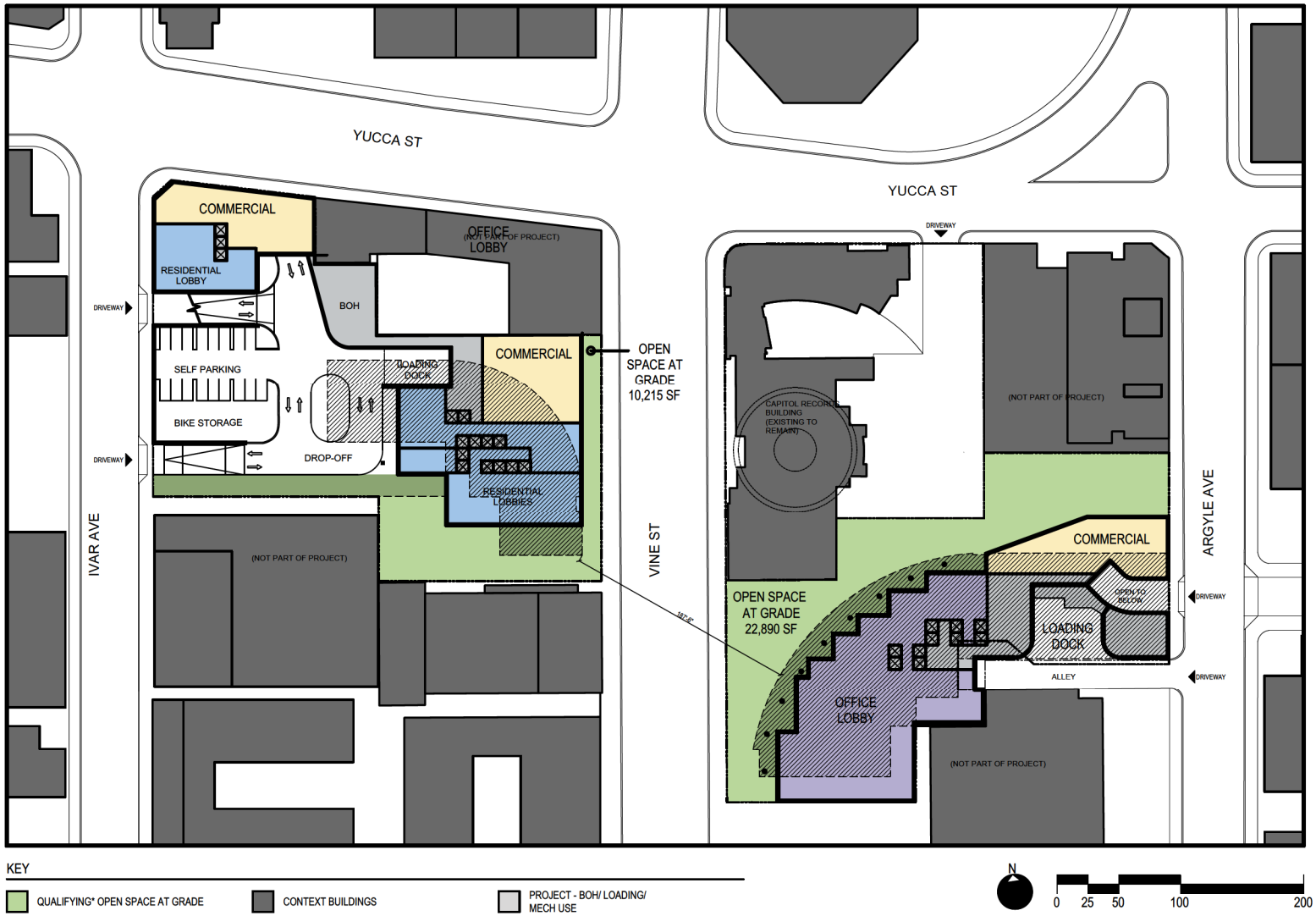
Figure V-19
Building Massing for Alternative 8

D170105.00

SOURCE: Handel Architects, 2020

Hollywood Center Project

Figure V-20
Alternative 8 Ground Floor Plan



D170105.00

SOURCE: Handel Architects, 2020

Hollywood Center Project

Figure V-21
Alternative 8 Building Footprints

- Self-sustaining green vegetative roofs to decrease storm water runoff, reduce heat island effect and increase biodiversity
- Use of regional materials to reduce the need to transport building materials
- Recycling room and building-wide trash and recycling
- Bicycle program, including bicycle storage, bicycle repair and valet, bicycle share
- Use of recycled content, material reuse, and low-emitting materials
- Green power purchasing program
- On-site transit information
- Enhanced refrigerant management to offset global warming potential
- Implementation of green cleaning throughout the Project
- ParkSmart certified parking garage, with electric charging stations, car share, ride share, and green cleaning[92]

Although the listed items are the same as under the LEED Gold Certification (see Section O, *Energy Conservation and Infrastructure*, of the Draft EIR), LEED Platinum requires more points of compliance with options offered under the LEED Certification program and, therefore, is held to a higher conservation standard than under LEED Gold. The WELL Gold Certification program for Alternative 8 focuses on features that contribute to the health and well-being of occupants and visitors. The combination of the LEED Platinum and WELL Gold Certifications would create a building with exceptional sustainability benefits. Example WELL Gold Certification features include:

- Enhanced ventilation in all floors, with 30 percent more fresh air than comparable buildings
- Fresh air systems, with advanced air filtration with 95-percent efficiency
- Rigorous air and water quality testing providing high quality fresh air and high quality water
- Office common amenities will provide healthy food and beverage options
- State-of-the-art fitness center that includes fitness equipment and programming
- Showering facilities for those that bike to work and/or use the fitness center

The components of Alternative 8 are compared to those of the Project in **Table V-13**, *Comparison of Alternative 8 to the Project*, below.

92 Parksmart is a certification program that defines, measures and recognizes high-performing, sustainable garages.

TABLE V-13
COMPARISON OF ALTERNATIVE 8 TO THE PROJECT

Component	Project	Project With the East Site Hotel Option	Alternative 8
Publicly Accessible Open Space	33,922 sf	33,922 sf	33,105 sf
East Site	24,990 sf	24,990 sf	22,890 sf
West Site	8,932 sf	8,932 sf	10,215 sf
Maximum Building Height			
East Site	46 stories, 595 feet	46 stories, 595 feet	17 stories, 367 feet
West Site	35 stories, 469 feet	35 stories, 469 feet	48 stories, 209 feet
Market-Rate Units Total	872 du	768 du	770
East Site	423 du	319 du	0
West Site	449 du	449 du	770
Senior Affordable Units Total	133 du	116 du	133
East Site	65 du	48 du	0
West Site	68 du	68 du	133
Hotel	N/A	220 rooms	N/A
Maximum Building Height Senior Buildings			
East Site	11 stories, 149 feet	9 stories, 131 feet	N/A
West Site	11 stories, 155 feet	11 stories, 155 feet	13 stories, 170 feet
Office Floor Area	N/A	N/A	386,347 sf
East Site	N/A	N/A	386,347
West Site	N/A	N/A	0 sf
Retail and Restaurant Floor Area Total	30,176 sf	30,176 sf	27,140 sf
East Site	17,485 sf	17,485 sf	14,402 sf
West Site	12,691 sf	12,691 sf	12,738 sf
Total New Floor Area	1,287,150 sf	1,277,741 sf	1,287,100 sf
East Site	638,407 sf	623,997 sf	400,749 sf
West Site	648,743 sf	648,744 sf	886,351 sf
Vehicle Parking	1,521 spaces	1,521 spaces	2,237 spaces
East Site	684 spaces	684 spaces	1,103 spaces
West Site	837 spaces	837 spaces	1,134 spaces
FAR[a]	6.973:1	6.901:1	6.973:1

[a] The calculated FAR includes new floor area in addition to the floor area of the Capitol Records and Gogerty Buildings (114,303 sf).

SOURCE: ESA, 2020

(2) Environmental Impacts

(a) Aesthetics

SB 743 (codified in PRC Section 21099(d)(1)) and ZI File No. 2452 provide that a mixed-use or employment center project in a designated TPA site and infill area is not required to evaluate physical aesthetic impacts pertaining to scenic vistas, scenic resources, and light and glare in an EIR. Although the Project and this Alternative meet these criteria, for disclosure purposes only, information based on City thresholds is provided relative to scenic vistas, scenic resources, and light and glare.

As aesthetics impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 8 apply to both the Project and the Project with the East Site Hotel Option.

(i) Scenic Vistas

Alternative 8 would involve the construction of three buildings. The East Site would be developed with the East Office Building, containing 386,347 square feet of office uses. The building would be 17 stories and reach a height of 317 feet at the top of the 17th story and 367 feet at the top of the bulkhead. The West Site would be developed with two residential structures. The West Building, along Vine Street, would be 48 stories and reach a height of 545 feet at the top of the 48th story and 595 feet at the top of the bulkhead. The West Senior Building, at the southeast corner of Yucca Street and Ivar Avenue, would be 13 stories and reach a height of 169 feet at the top of the 13th story and 209 feet at the top of the bulkhead.

Construction and operation of Alternative 8 would affect public views across the existing surface parking lots and views of scenic elements within the Project Site. As with the Project, a construction fence will be erected along the periphery of the Project Site, including Vine Street (required under Project Design Feature AES-PDF-1), which would temporarily block views of the “Hollywood Jazz: 1945-1972” mural. Construction activities would also require the temporary removal of a portion of the Hollywood Walk of Fame. However, construction would be temporary and would not have a permanent substantial adverse effect on views of these features. As with the Project, the West Building would block some passing views of the historic Knickerbocker sign from the Hollywood Freeway. However, similar to the Project, because of the continuous movement of traffic and availability of other freeway views to the sign, the effect on this freeway view is not considered a substantial adverse effect of Alternative 8.

There are no existing significant panoramic views across the Project Site of the historic Hollywood Sign from adjacent streets or other public areas. Public views of broader scenic resources, such as the mountains and the Hollywood Sign

through other street corridors, would continue to be available and would not be affected by construction or operation of Alternative 8. As with the Project, Alternative 8 would block intermittent views of the historic Capitol Records Building from sections of Ivar Avenue, Hollywood Boulevard, and Argyle Avenue. During construction and operation, the Capitol Records Building would continue to be visible from more prominent view locations, such as the Hollywood Hills or other sections along the affected local streets. As with the Project, Alternative 8 would provide additional viewing opportunities of the Capitol Records Building from the new public paseo through the Project Site. As with the Project, the East Site high-rise building (East Office Building) would be set back from Vine Street to allow views of the Capitol Records Building from the intersection of Hollywood Boulevard and Vine Street. Furthermore, view effects on scenic vistas would not be materially altered by the varying buildings between Alternative 8 and the Project. As with the Project, Alternative 8 would not result in substantial adverse effects on scenic vistas. Therefore, when compared to the Project, the effects on scenic vistas under Alternative 8 would be similar to the Project

(ii) Scenic Resources

Impacts to on-site scenic resources, such as the on-site Capitol Records Building, the "Hollywood Jazz: 1945-1972" mural, the adjacent Hollywood Walk of Fame, and existing street trees, under Alternative 8 would be the same as the Project. Similar to the Project, construction vehicles and other construction activity on or adjacent to the Vine Street sidewalk under Alternative 8 would potentially impact the Hollywood Walk of Fame. However, as with the Project, implementation of Mitigation Measure CUL-MM-1 would ensure protection and temporary removal of the bronze and terrazzo Hollywood Walk of Fame stars and reduce impacts to less-than-significant. As with the Project, Alternative 8 would replace removed street trees with similar species and plant additional trees within the Project Site's open space areas, including the paseo, in accordance with the requirements of the LAMC and the City's Urban Forestry Division's requirements (currently requiring street tree replacement on a 2:1 basis). In addition, similar to the Project, Alternative 8 would preserve the "Hollywood Jazz: 1945-1972" mural. Overall, similar to the Project, Alternative 8 would not substantially damage scenic resources. As with the Project, Alternative 8 would implement measures to ensure the Hollywood Walk of Fame is protected and that no physical changes to nearby scenic resources or historic buildings would occur. Therefore, when compared to the Project, the effects on scenic resources under Alternative 8 would be similar to the Project.

(iii) Regulations Governing Scenic Quality

CEQA Appendix G addresses whether a project in an urban area would conflict with regulations that govern scenic quality, such as those applicable to street trees, exterior lighting, signage, and compliance with applicable policies of the General Plan or Community Plan. As with the Project, Alternative 8 would replace street

trees and provide exterior lighting in compliance with LAMC regulations and would comply with signage regulations set forth under the HSSUD. In addition, similar to the Project, Alternative 8 would not conflict with Objective 7 of the Hollywood Community Plan, which requires the preservation of open space and promotes the preservation of views, natural character and topography of mountainous parts of the Hollywood community. The Project Site is visible from the Mulholland Scenic Parkway's Hollywood Bowl Overlook, an area with broad open space views in the Hollywood Hills. As with the Project, Alternative 8 would not adversely affect views from this open space area and, as such, would be consistent with Objective 7 of the Community Plan to preserve views. Therefore, similar to the Project, Alternative 8 would not conflict with the LAMC, HSSUD, or the applicable Community Plan open space policy. As with the Project, impacts under Alternative 8 would be less than significant. As Alternative 8 would also comply with regulations governing scenic quality, impacts under Alternative 8 would be similar to the Project.

(iv) Light and Glare

As with the Project, Alternative 8 would introduce new lighting, including temporary construction lighting, wayfinding lights, security lighting, landscape lighting, street-level commercial signs, paseo lighting, architectural accent lighting, and interior lighting visible through windows, all of which would be installed pursuant to LAMC lighting requirements. Architectural lighting would be provided at the top of the new buildings, as under the Project. In combination with the Capitol Records Building, any architectural lighting and signage would be consistent with HSSUD policy encouraging illuminated signage to reflect a modern, vibrant image of Hollywood. However, as with the Project, no still or moving images would be projected onto the buildings. Project Design Feature AES-PDF-3 would ensure that glass used in building façades will be anti-reflective or treated with an anti-reflective coating in order to minimize glare. Project Design Feature AES-PDF-4 would require that construction and operational lighting be shielded and directed downward (or on the specific on-site feature to be lit) in such a manner so as to avoid undue glare or light trespass onto adjacent uses. Similar to the Project, the incorporation of Project Design Features and LAMC requirements in Alternative 8 would ensure that potential light and glare would not adversely affect day or nighttime views. Although Alternative 8 would result in the different maximum building heights and massing, it would have similar overall floor area that would result in light and glare effects similar to the Project.

(b) Air Quality

Daily air quality construction emissions would be similar under the Project and the Project with the East Site Hotel Option. While the Project and the Project with the East Site Hotel Option would have nominally different daily operational emissions, the impact conclusions, significance levels, and mitigation measures are the same for the Project and the Project with the East Site Hotel Option. Accordingly, the

below comparisons of impacts of Alternative 8 apply to both the Project and the Project with the East Site Hotel Option.

(i) Conflict with an Air Quality Management Plan

Similar to the Project, Alternative 8 would include new development on the Project Site that would generate new criteria pollutant emissions. Similar to the Project, Alternative 8 would be consistent with the goals of SCAG's 2016-2040 RTP/SCS and growth projections in the 2016 AQMP, since the growth would occur in a HQTA and a TPA. As with the Project, Alternative 8 would be consistent with the AQMP in its incorporation of appropriate control strategies for emissions reduction during construction and operation. In addition, Alternative 8 would also be consistent with applicable goals, objectives, and policies of the Air Quality Element of the General Plan that support and encourage pedestrian activity in the Hollywood area and uses that contribute to a land use pattern addressing housing needs while reducing vehicle trips and air pollutant emissions within a TPA. For all of these reasons, impacts under Alternative 8 with respect to consistency with air quality management plans would be less than significant and similar to the Project.

(ii) Cumulative Increase in Criteria Pollutants/Violation of Air Quality Standards

(a) Construction

As with the Project, Alternative 8's construction phases have the potential to generate emissions that would exceed SCAQMD air quality standards through the use of heavy-duty construction equipment, construction traffic, fugitive dust emissions, paving operation, and the application of architectural coatings and other building materials. The maximum emissions under Alternative 8 would be similar to the Project because emission levels are based on a single day in which maximum construction activity would occur. Similar to the Project, with incorporation of Mitigation Measure AQ-MM-1 which would require the use of diesel-powered construction equipment that meet USEPA Tier 4 Final off-road emissions standards; use of pole electricity or alternative energy to power electric tools, equipment, and lighting; maintenance and operation of construction equipment to minimize exhaust emissions; and incorporation of Project Design Feature GHG-PDF-1 (Green Building Features), construction emissions under Alternative 8 would not exceed SCAQMD numerical significance thresholds. Similar to the Project, because Alternative 8's construction emission levels would be below the applicable numerical significance thresholds, emissions related to air quality standards would be less than significant. Alternative 8's floor area and expected duration of construction would be the same as under the Project and, as such, impacts relative to air quality threshold standards under Alternative 8 would be similar to the Project.

(b) Operation

During operation, Alternative 8 would generate emissions associated with vehicle trips, heating, lighting, other electric and natural gas power requirements, emergency generators, and architectural coatings. Similar to the Project, Alternative 8 would incorporate Project Design Feature GHG-PDF-1 (Green Building Features) and would comply with SCAQMD Rule 1113 regarding architectural coatings.

NOx emissions would be 76 and 79 pounds per day for the Project and the Project with the East Site Hotel Option, respectively. The daily impact threshold for NOx is 55 pounds per day. Alternative 8 would have a similar land use intensity and result in more traffic than the Project and require a sizeable generator that, along with its collective NOx generating sources, are expected to be above 55 pounds per day. Alternative 8 would implement the same Mitigation Measure AQ-MM-2 as the Project to reduce operational NOx levels to a less-than-significant level.

Similar to the Project, Alternative 8 would not exceed the SCAQMD numerical significance thresholds for VOC, CO, SOx, PM10, and PM2.5. Thus, as with the Project, impacts under Alternative 8 would be less than significant after mitigation for these criteria pollutants. However, because of its increased mobile source emissions, impacts under Alternative 8 with respect to cumulative increases in criteria pollutants and violations of air quality standards would be greater than Project.

(iii) Exposure of Sensitive Receptors to Pollutant Concentrations

(a) Localized Emissions

As with the Project, Alternative 8 would generate localized emissions during construction and operation. It can be expected that maximum daily localized construction emissions would be similar to the Project. As with the Project, maximum localized emissions associated with grading and architectural coatings during construction and charbroilers, landscaping, coatings, and use of consumer products, and other sources at sensitive receptors would be below the localized screening thresholds for NO_X, CO, PM10, and PM2.5, including at the nearest receptors adjacent to the Project Site. Therefore, similar to the Project, with respect to localized construction emissions, impacts to sensitive receptors would be less than significant under Alternative 8.

Based on energy consumption modeling for Alternative 8, natural gas usage in Alternative 8 would be approximately 10 percent higher and approximately 2 percent higher when compared to the Project and the Project with the East Site

Hotel Option, respectively.[93] Generally, natural gas usage is an indicator of localized emissions. Alternative 8 would have a similar scale of construction and overall building massing as compared the Project. Because natural gas usage would be slightly higher for the Project and less than the Project with the East Site Hotel Option, impacts under Alternative 8 with respect to localized emissions would be greater than the Project.

(iv) Carbon Monoxide Hotspots

Vehicle trips would be higher under Alternative 8 than the Project. As discussed in Section IV.B, *Air Quality*, the intersection of Vine Street and Sunset Boulevard would have a maximum traffic volume of approximately 78,380 ADT under the Project buildout scenario and a maximum traffic volume of approximately 78,420 under the Project with the East Site Hotel Option scenario based on future year 2027 traffic volumes. Total traffic volumes would likely have to more than double to cause or contribute to a CO hotspot impact. As with the Project, Alternative 8 would not cause traffic volumes to double at the maximum impacted intersection. Thus, similar to the Project, Alternative 8 would not cause or contribute considerably to the formation of CO hotspots and impacts would be less than significant. However, because Alternative 8 would increase the Project's daily vehicle trips, impacts would be greater than the Project.

(a) Toxic Air Contaminants

(i) Construction

Under Alternative 8, as with the Project, temporary TAC emissions associated with DPM emissions from heavy construction equipment would occur during construction activities. Mitigation Measure AQ-MM-1 would require utilization of off-road diesel-powered construction equipment that meets or exceeds the most stringent and environmentally protective CARB and USEPA Tier 4 off-road emissions standards. The Tier 4 standards would reduce DPM emissions by approximately 81 to 96 percent compared to equipment that meet the Tier 2 off-road emissions standards. As with the Project, with implementation of the required mitigation, Alternative 8 would not expose sensitive receptors to substantial TAC concentrations and impacts would be less than significant. As Alternative 8 would have a similar scale of development (floor area) as under the Project, impacts under Alternative 8 would be similar to the Project.

(ii) Operation

Alternative 8, as with the Project, would use consumer products and architectural coatings or involve other sources, such as charbroiling associated with restaurant uses. TAC emissions from these sources are anticipated to be minimal and all

[93] Refer to Appendix R, Alternative Analyses, for CalEEMod operational energy demand worksheets for Alternative 8.

restaurant emissions would be regulated under SCAQMD Rule 1138. In addition, Alternative 8 would provide stationary emergency generators for its buildings. The emergency generators would result in emissions during maintenance and testing operations. Emergency generators are permitted by the SCAQMD and regulated under SCAQMD Rule 1470. Maintenance and testing would occur periodically, up to 50 hours per year per Rule 1470. As with the Project, Alternative 8's land uses would not include installation of industrial-sized paint booths or require extensive use of commercial cleaning products. Alternative 8 would generate only minor amounts of diesel emissions from mobile sources (non-on-site construction vehicles), such as delivery trucks that would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. Furthermore, trucks would be required to comply with the applicable provisions of the CARB 13 CCR, Section 2025 (Truck and Bus regulation) to minimize and reduce PM and NO_X emissions from existing diesel trucks. However, with its office component, there would be more delivery trucks to the Project Site under Alternative 8 than the Project. Nonetheless, toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the uses expected on the Project Site, as with the Project, potential long-term operational impacts associated with the release of TACs under Alternative 8 would be minimal, regulated, and controlled, and would not be expected to exceed the applicable SCAQMD numerical significance thresholds. Operation of Alternative 8, as with the Project, would not expose sensitive receptors to substantial TAC concentrations, and operational impacts would be less than significant. Accordingly, impacts with respect to other emissions under Alternative 8 would be similar to the Project.

(b) Other Emissions Affecting a Substantial Number of People

Activities under Alternative 8 would potentially generate other emissions, such as those leading to odors. These may include the use of architectural coatings and solvents, as well as the combustion of diesel fuel in on-and off-road equipment. SCAQMD Rule 1113 would limit the amount of VOCs in architectural coatings and solvents. In addition, Alternative 8 would comply with the applicable provisions of the CARB Air Toxics Control Measure regarding idling limitations for diesel trucks. Through mandatory compliance with SCAQMD rules, construction activities and materials are not expected to result in emissions that would create objectionable odors affecting a substantial number of people. Operation of Alternative 8 would not involve land uses typically associated with odor complaints, such as agricultural uses or food processing plants, or any uses identified by the SCAQMD as being associated with substantial odors. As with the Project, Alternative 8 is not expected to discharge contaminants into the air in quantities that would cause a nuisance, injury, or annoyance to the public or property pursuant to SCAQMD Rule 402. Therefore, as with the Project, odor and other emissions impacts under

Alternative 8 would be less than significant. Accordingly, impacts with respect to other emissions under Alternative 8 would be similar to the Project.

(c) Cultural Resources

As cultural resources impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 8 apply to both the Project and the Project with the East Site Hotel Option.

(i) Historical Resources

As with the Project, Alternative 8 would not demolish or cause an adverse material change in the eligibility of any historical resources within the Project Site. However, as with the Project, the maximum building heights under Alternative 8 (48 stories and 13 stories on the West Site and 17 stories on the East Site) would alter the larger setting of the area and, potentially, the historic setting of the Hollywood Boulevard Historic District. As with the Project, the Historic District is primarily characterized by low massing compared to larger, taller buildings under Alternative 8. Hollywood has been characterized by such juxtapositions since the late 1950s when the prevailing height limit of 150 feet was removed and larger scale development ensued, altering the former low-scale setting of the area. While the introduction of additional tall buildings would continue this pattern of development and change to the historic setting, the historic significance of historical resources in the area would not be materially impaired. Alternative 8's tallest West Building (48 stories) would be two stories taller than the Project's tallest 46-story East Building; however, the East Office Building under Alternative 8 at 17 stories would be shorter than the 35-story West Building under the Project. Due to the varying building heights and masses, the extent of indirect impacts between Alternative 8 and the Project would not be substantially different. Therefore, indirect impacts associated with contrasting building heights and massing would be less than significant under Alternative 8 and similar to the Project.

As with the Project, Alternative 8 would also result in temporary alterations to the Hollywood Walk of Fame and potentially significant and unavoidable impacts due to structural vibration at nearby historical resources during construction. As with the Project, impacts associated with Alternative 8 could be reduced to less-than-significant with implementation of Mitigation Measures CUL-MM-1, CUL-MM-2, and NOI-MM-4. As with the Project, the mitigation available for Alternative 8 would avoid significant impacts on the Capitol Records Building and Gogerty Building and would provide similar protections to the other proximate historical buildings subject to potential structural damage from vibration, as follows: the Pantages Theatre, Avalon Hollywood, and the building located at 6316-24 Yucca Street/Art Deco Storefront. However, because Mitigation Measure CUL-MM-2 and Mitigation Measure NOI-MM-4 require the consent of other property owners, who may not agree to participate in their implementation, it is conservatively concluded that

structural vibration and settlement impacts on proximate historical resources would remain significant and unavoidable after implementation of mitigation measures. As construction activities would be similar, vibration impacts to historical resources under Alternative 8 would be similar to the Project.

(ii) Archaeological Resources

As with the Project, excavation associated with Alternative 8 would reach a maximum depth of 64 feet for subterranean parking. Similar to the Project, these excavations would cut into the historic fill layer, as well as previously undisturbed native soils. Such depths have the potential to encounter prehistoric and/or historic archaeological resources. Alternative 8, as with the Project, would implement Mitigation Measures CUL-MM-3 through CUL-MM-5. With the implementation of these measures, Alternative 8, as with the Project, would provide for appropriate treatment and/or preservation of resources if encountered. Under Alternative 8, as with the Project, potentially significant impacts to archaeological resources would be mitigated to a less-than-significant level. Thus, impacts related to archaeological resources under Alternative 8 would be similar to the Project.

(iii) Human Remains

As with the Project, excavation associated with Alternative 8 would reach depths of around feet on the East Site and West Site for five subterranean levels. Pursuant to California Health and Safety Code Section 7050.5, Public Resources Code 5097.98, and California Code of Regulations Section 15604.5(e), any discovery of unrecorded human remains would require the immediate halting of construction or ground-disturbing activities and notification of the County Coroner. If the remains are determined to be Native American in origin, a “Most Likely Descendent” would be contacted to assist in determining appropriate treatment for the remains. In the event of the discovery of unrecorded human remains during construction, compliance with applicable regulatory requirements would ensure potential impacts are less than significant. Thus, Alternative 8, as with the Project, would have a less-than-significant impact with respect to human remains. Therefore, impacts with respect to human remains under Alternative 8 would be similar to the Project.

(d) Geology and Soils

As geology and soils impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 8 apply to both the Project and the Project with the East Site Hotel Option.

(i) Seismic Hazards

The Project Site is located within the designated Alquist-Priolo Earthquake Fault Zone for the Hollywood Fault; however, underlying soil horizons indicate the

Project Site has not experienced fault movement for at least 120,000 years and active faulting does not occur beneath the Project Site. Similar to the Project, excavation for Alternative 8's subterranean parking would remove the loose sand deposit and require suitable engineered stabilization in accordance with applicable City and CBC building regulations. The Project Site is not located within a designated landslide area, and the potential for landslide and seismically induced slope instability at the Project Site is considered to be low. As with the Project, Alternative 8's application of appropriate engineering controls and compliance with regulations for planned excavation and construction would minimize any potential site stability geologic hazards at the Project Site. Therefore, development of Alternative 8, as with the Project, would not result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury caused in whole or in part by exacerbation of existing environmental conditions. As with the Project, impacts related to geologic conditions under Alternative 8 would be less than significant through proper engineering methods and compliance with City and CBC building regulations. With implementation of building regulations and recommendations of applicable final geotechnical reports, impacts with respect to seismic hazards under Alternative 8 would be similar to the Project.

(ii) Soil Erosion or Loss of Topsoil

Excavation for parking structures associated with Alternative 8 would reach depths of 64 feet on the East Site and 60 feet on the West Site. Similar to the Project, construction of Alternative 8 would increase soil exposure and risk of soil erosion. The potential for water erosion under Alternative 8 would be reduced by the implementation of standard erosion control measures during site preparation and grading activities. Construction activities would be carried out in accordance with applicable City standard erosion control practices required pursuant to the CBC and the requirements of the NPDES Construction General Permit issued by the LARWQCB, as applicable. In accordance with these requirements, a SWPPP would be prepared that incorporates BMPs to control water erosion during the construction period. Following construction, the Project Site would be covered completely by paving, structures, and landscaping, which would not leave any exposed areas of bare soil susceptible to erosion. Thus, similar to the Project, impacts due to erosion of topsoil would be less than significant under Alternative 8. Alternative 8, like the Project, would comply with CBC building regulations and implement a SWPPP and BMPs and, as with the Project, would result in less than significant soil erosion impacts. Based on the above, impacts under Alternative 8 would be similar to the Project.

(iii) Unstable Geologic Units

Alternative 8, as with the Project, would include sloped excavations properly shored in accordance with applicable provisions of the CBC to minimize the potential for site stability hazards during temporary excavation activities. As with the Project, Alternative 8 would not be located on an unstable geologic unit. In

addition, Alternative 8 would comply with CBC requirements and, prior to issuance of a grading permit, a qualified geotechnical engineer must prepare and submit to the LADBS a Final Geotechnical Report that includes site-specific design recommendations for seismic safety and design requirements for foundations, retaining walls/shoring and excavation to meet applicable State and City code and regulations. As with the Project, through adherence to the CBC and the recommendations of the Final Geotechnical Report, impacts with respect to geologic units under Alternative 8 would be less than significant and similar to the Project.

(iv) Expansive Soils

Similar to the Project, Alternative 8 would encounter and remove near surface soils that have a low to medium potential for expansion during excavation activities. In addition, expansive soil hazards would be further evaluated for the Project Site as part of the LADBS approved Final Geotechnical Report that would include site-specific design recommendations for addressing expansive soils, as needed. Further, as with the Project, compliance with standard construction and engineering practices, and proper engineering erosion control and drainage design would ensure that hazards associated with potential expansive soils or corrosive soils are properly addressed. As such, as with the Project, impacts related to expansive soils or corrosive soils under Alternative 8 would be less than significant and similar to the Project.

(v) Paleontological Resources

Excavation associated with Alternative 8 would reach depths of 64 feet on the East Site and 60 feet on the West Site for subterranean parking. As such, although excavation depths would be somewhat reduced, Alternative 8, as with the Project, could access high sensitivity alluvial sediments. This classification indicates a high potential for fossils to be present in the subsurface. Similar to the Project, implementation of Mitigation Measures GEO-MM-1 through GEO-MM-3 under Alternative 8, would provide for appropriate treatment and/or preservation of resources and would mitigate impacts to paleontological resources to less-than-significant. As excavation depths would be similar under Alternative 8, impacts related to paleontological resources would be similar to the Project.

(e) Greenhouse Gas Emissions

Despite the Project and the Project with the East Site Hotel Option having slightly different overall GHG emissions, because impact conclusions and significance levels related to GHG emissions would be the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 8 apply to both the Project and the Project with the East Site Hotel Option.

The construction and occupancy of the Project Site under Alternative 8, as with the Project, would increase GHG emissions over existing conditions. As with the Project, Alternative 8 would incorporate GHG reduction characteristics, features, and measures. Although the State and City have not established quantitative values for GHG emissions, in order to comply with policies and regulations adopted for the purpose of reducing or mitigating GHG emissions, Alternative 8, as with the Project, would incorporate AQ-PDF-1, AQ-PDF-2 and GHG-PDF-1. Alternative 8 would result in increased traffic and higher mobile emissions, and, thus, maximum GHG operational emissions would be higher than the Project. With incorporation of applicable Project Design Features, GHG emission impacts under Alternative 8, as with the Project, would be less than significant. Due to its higher GHG emissions, impacts under Alternative 8 with respect to GHG emissions on the environment would be greater than the Project.

Alternative 8, as with the Project, with incorporation of AQ-PDF-1, AQ-PDF-2 and GHG-PDF-1, would be consistent with applicable strategies outlined in CARB's Climate Change Scoping Plan, SCAG's 2016-2040 RTP/SCS, Sustainable City pLAn, and the City's Green Building Code. As such, similar to the Project, impacts related to conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs would be less than significant under Alternative 8. As discussed under the Transportation subsection, below, Alternative 8 would result in a 4.5 household VMT per capita and a 4.7 employee VMT per capita. The Project would result in 4.8 household per capita VMT and the Project with the East Site Hotel Option would result in a 4.7 household per capita VMT and 4.8 work VMT per employee. As such, Alternative 8 would not exceed the Central APC's household VMT threshold standard of 6.0 or the employee threshold standard of 7.5. However, Alternative 8 with its lower household and work VMT per employee would meet the objectives of adopted policies and land use strategies to reduce GHGs through mixed-use development within the TPA to a higher extent than the Project, and thus, impacts related to GHG reduction policies would be less than the Project.

(f) Hazards and Hazardous Materials

As impacts related to hazards and hazardous materials would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of Alternative 8 apply to both the Project and the Project with the East Site Hotel Option.

(i) Hazards to the Public or Environment through the Routine Transport, Use, or Disposal of Hazardous Materials

Construction of Alternative 8, as with the Project, would include demolition of existing parking surfaces and structures other than the Capitol Records Complex. Construction equipment and materials, such as fuels, oils and lubricants, solvents

and cleaners, adhesives, paints and thinners, degreasers, cement and concrete, and asphalt mixtures, which are all commonly used in construction, would be used, stored, and disposed of in consumer quantities and in accordance with applicable laws and regulations and manufacturers' instructions. As with the Project, operation of Alternative 8 would involve the limited use of potentially hazardous materials typical of those used in residences, offices, and restaurants, including cleaning agents, paints, pesticides, and other materials used for landscaping. In addition, hazardous materials on the Project Site would continue to be acquired, handled, used, stored, and disposed of in accordance with all manufacturers' specifications and all applicable federal, State, and local requirements. Compliance with all applicable regulations concerning the transport, use, and disposal of hazardous waste under Alternative 8, as with the Project, would reduce hazardous materials impacts to a less-than-significant level. Due to of the similarity in the scale of Alternative 8 and the Project, impacts with respect to the routine transport, use and disposal of hazardous materials under Alternative 8 would be similar to the Project.

(ii) Hazard to the Public or Environment Involving the Accidental Release of Hazardous Materials into the Environment

Alternative 8 would require excavation of soil at depths of 64 feet on the East Site and 60 feet on the West Site for subterranean parking. Such excavation could expose the public or the environment to contaminated soils and soil vapors, and could reveal remnant steel structures and/or possibly USTs associated with historic automobile gas and service stations. As with the Project, under Alternative 8, Mitigation Measure HAZ-MM-1 (Soil Management Plan), would be implemented and would establish policy and requirements for the disposal of contaminated soils and management of soil vapors or other gases during excavation activities. Therefore, impacts under Alternative 8 related to the accidental release of hazardous materials during construction would be less than significant after mitigation and similar to the Project.

(iii) Hazard Resulting from Hazardous or Acutely Hazardous Materials, Substances, or Waste within One-Quarter Mile of a School

Alternative 8, as with the Project, is not located within one-quarter mile of a school. Similar to the Project, Alternative 8 would implement Mitigation Measure HAZ-MM-1 (Soil Management Plan), which would establish policy and requirements during construction for the disposal of contaminated soils and management of soil vapors or other gases during excavation activities. Also, similar to the Project, Mitigation Measure AQ-MM-1 would be implemented under Alternative 8 requiring the use of Tier IV construction equipment to minimize TAC emissions. In addition, during operation Alternative 8 would not require the handling of acutely hazardous materials or result in the emission of hazardous materials other than, potentially,

VOCs. associated with diesel vehicles and consumer products (e.g., architectural coatings, household cleaners, landscaping fertilizers and pesticides, etc.). Alternative 8, as with the Project, during operation would only require the limited use of potentially hazardous materials associated with domestic maintenance and landscaping. In addition, Alternative 8 would comply with applicable local, State, and Federal laws and regulations relating to the use of hazardous or acutely hazardous materials and would implement Mitigation Measure HAZ-MM-1 (Soils Management Plan) to ensure that any existing vapors or materials within the existing site would be safely managed. Therefore, as with the Project, impacts related to the use of hazardous or acutely hazardous materials within a quarter mile of a school under Alternative 8 would be less than significant and similar to the Project.

(iv) Hazardous Materials Sites

Alternative 8, similar to the Project, would not involve construction or alter existing activities on a hazardous materials site compiled pursuant to Government Code Section 65962.5. Accordingly, Alternative 8 and the Project would have no impact with regard to development occurring on a hazardous materials site. Thus, impacts related to development on a hazardous materials site under Alternative 8 would be similar to the Project.

(v) Emergency Response Plan/Emergency Evacuation Plan

Alternative 8, as with the Project, would involve new construction and increased traffic. Alternative 8, as with the Project, would not however, affect the City's Emergency Operations Plan or established disaster evacuation routes, the nearest of which are Santa Monica Boulevard approximately 0.8 miles to the south and Highland Avenue approximately 0.6 miles to the west. As with the Project, Alternative 8 would not require any policy or procedural changes to the City of Los Angeles Emergency Operations Plan or the City's established disaster routes. Also, during an unanticipated disaster event, the LAPD and LAFD would implement operational protocols, as well as plans and programs, on a case-by-case basis, to facilitate emergency evacuations and/or response, which would consider traffic conditions at the time of the emergency. In such instances, traffic would be routed along the City's numerous disaster routes, as determined appropriate by the responding City agencies. Similar to the Project, construction and operation of Alternative 8 would not close any existing streets or otherwise represent a significant impediment to emergency response or evacuation of the local area. Construction of Alternative 8, as with the Project, would occur within the boundaries of the Project Site and within the rights-of-way of adjacent streets, including the median within Vine Street and signal installation along Argyle Avenue. Temporary partial lane closures are not anticipated to significantly affect the circulation of emergency vehicles, which normally have a variety of options for dealing with traffic and congestion, such as sirens, priority use of the roadway, and

use of alternate routing. In addition, Alternative 8, as with the Project, would implement Project Design Feature TRAF-PDF-2, which requires preparation of a Construction Traffic Management Plan and includes street closure information, a detour plan, haul routes, and a staging plan. The Construction Traffic Management Plan will be submitted to the City for review and approval. With Project Design Feature TRAF-PDF-2, construction of Alternative 8, like the Project, would not substantially impede public access, create severe consequences for emergency response vehicles, substantially impede travel upon a public right-of-way, or interfere with an adopted emergency response or evacuation plan. During operation, Alternative 8, as with the Project, would be required to establish, implement, and maintain an emergency response plan. The emergency response plan, which would be submitted to the LAFD for inspection and approval prior to implementation, would be inspected annually by the LAFD and include evacuation procedures. In addition, the California Fire Code, Chapter 10, Means of Egress, requires that all habitable structures comply with the California Fire Code, including providing ingress and egress during emergencies. As with the Project, compliance with existing regulations would ensure that an adequate emergency response plan is established for Alternative 8. Overall, as with the Project, impacts under Alternative 8 with respect to conflicts with or interfering with emergency response or evacuation plans would be less than significant. However, because Alternative 8 would generate more daily vehicle trips and result in higher occupancy than the Project, impacts with regard to emergency response would be greater than the Project.

(g) Hydrology and Water Quality

As hydrology and water quality impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of the Alternative 8 apply to both the Project and the Project with the East Site Hotel Option.

(i) Water Quality

(a) Construction

Alternative 8, as with the Project, would include construction activities, including earth moving, maintenance/operation of construction equipment, potential dewatering, and handling/storage/disposal of materials, that could contribute to pollutant loading in stormwater runoff from the construction site. Also, wind could convey exposed and stockpiled soils at the construction site into nearby storm drains during storm events, and on-site water activities for dust suppression purposes could contribute to pollutant loading in runoff from the construction site. Alternative 8, as with the Project, would excavate for subterranean garages to a maximum depth of 64 feet, with both reaching deeper levels for foundation features. Groundwater depths range from less than 49.2 bgs to approximately 98.3 feet bgs across the Project Site. Alternative 8, as with the Project, has the potential

to encounter groundwater during construction. Dewatering, which is subject to LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, may be required. The potential impact related to pollutant loading or groundwater quality that would cause exceedances of water quality standards would be reduced to less-than-significant levels for Alternative 8, as well as the Project, through compliance with regulatory requirements, BMPs, and Building Code grading procedures. However, because the construction footprint and the depth of excavation under Alternative 8 would be similar to the Project, the potential exposure of excavated soils to the elements and encroachment into the water table would be similar to the Project. As such, the potential impact with respect to violations of water quality standards during construction under Alternative 8 would be similar to the Project.

(b) Operation

Alternative 8, as with the Project, would incorporate a drainage collection and conveyance system that would detain and treat/filter runoff in compliance with the City's LID Manual requirements to reduce the quantity of, and improve the quality of, rainfall runoff leaving the Project Site. With the implementation of such system and BMPs, Alternative 8, as with the Project, would result in an improvement in the quality of stormwater runoff from the Project Site compared to existing conditions. As with the Project, impacts related to water quality standards under Alternative 8 would be less than significant and would be similar to the Project.

(ii) Decreases in Groundwater Supplies or Recharge

Alternative 8, as with the Project, would not require groundwater withdrawal. However, similar to the Project, excavation for the foundations and the subterranean garages during construction of Alternative 8 would have the potential to intercept the groundwater table and, as such, some groundwater removal may be required during construction. Such dewatering during construction would not result in the substantial removal of groundwater that would reduce the local groundwater table. Further, dewatering would only occur temporarily during construction and would not continue post-construction.

Under Alternative 8, as with the Project, subterranean parking would be below the redeveloped areas of the Project Site, resulting in no material change to the amount of stormwater that would percolate into the groundwater table compared to existing conditions. Therefore, similar to the Project, pre- and post-Project infiltration volumes are considered effectively equivalent under Alternative 8. Accordingly, similar to the Project, there would not be a substantial reduction in groundwater recharge from current conditions, and Alternative 8 would not introduce activities that could impede sustainable groundwater management of the basin.

Overall, neither Alternative 8 nor the Project would cause substantial depletion of groundwater supplies or substantially interfere with groundwater recharge. Therefore, the impact regarding groundwater recharge or depletion under Alternative 8 would be less than significant and similar to the Project

(iii) Alteration of Drainage Pattern

(a) Construction

Alternative 8, as with the Project, would include construction activities that could contribute to erosion or siltation if soils are exposed during development of the Project Site. Alternative 8 would require similar excavation and export of materials as under the Project. Similar to the Project, Alternative 8 would cause a temporary increase in permeable surfaces during construction that would reduce, rather than increase, off-site runoff from the Project Site during a portion of the construction. As with the Project, construction BMPs to manage runoff flows and avoid on- or off-site flooding, would be implemented under Alternative 8. As with the Project, the BMPs would reduce runoff that would potentially create or contribute runoff water exceeding the capacity of existing or planned stormwater drainage systems under Alternative 8. The overall duration of construction activities and the maximum off-site flow of Alternative 8 would be similar to the Project. The impact regarding stormwater drainage system capacity would be similar to the Project and less than significant. With implementation of BMPs, impacts with respect to surface runoff, siltation, rates of runoff and capacity of drainage systems under Alternative 8, as with the Project, would be less than significant. Overall, impacts would be similar to the Project.

(b) Operation

Alternative 8, as with the Project, would largely maintain existing drainage patterns at the Project Site. As with the Project, Alternative 8 would include a drainage system that meets City stormwater retention, treatment and runoff requirements, including all applicable LID requirements. Additionally, under Alternative 8, as with the Project, a reduced peak flow rate of stormwater runoff from the Project Site would occur due to the retention afforded by the proposed LID system and LID BMPs. Due to similarity in site coverage and in the proposed stormwater retention system, the volume of stormwater runoff from the Project Site requiring conveyance by the existing off-site storm drain system would decrease to the same extent under Alternative 8 as with the Project. Therefore, impacts under Alternative 8 would be less than significant and similar to the Project.

(iv) Pollutant Release in Flood Hazard, Tsunami, or Seiche Zones

The Project Site is not located within a 100-year floodplain and is not in a tsunami zone and would not be subject to such flooding hazards. The Project Site is located approximately one mile from the Hollywood Reservoir. Given the distance to the

Hollywood Reservoir, any oscillation and subsequent release of water within the reservoir as part of a seiche would not inundate the Project Site. Thus, there would be no potential for risk of release of pollutants due to inundation by seiche.

The Project Site is located within the Hollywood Reservoir inundation area.[94] In compliance with applicable regulatory requirements, Alternative 8, as with the Project, would implement BMPs to minimize pollutants within the Project Site during construction. Post-construction, the nature of pollutants would be typical of other developed sites within the dam inundation area. Dam safety regulations executed by the California Department of Water Resources and other agencies are the primary means of reducing damage or injury due to inundation occurring from dam failure, and reduce the likelihood of inundation. Regarding pollutant release, because Alternative 8, as with the Project, would actively maintain a stormwater management system and would be entirely developed with enclosed parking, buildings, and established landscaping, the exposure of flood waters to pollutants would be minimized. Thus, in the unlikely event of on-site inundation, Alternative 8, like the Project, would not result in the release of significant types or quantities of pollutants. As with the Project, impacts with respect to a significant risk of release of pollutants to inundation by flooding, tsunami, or seiche under Alternative 8 would be less than significant and similar to the Project.

(v) Implementation of Water Quality Control Plans

Alternative 8, as with the Project, would incorporate into its design an on-site drainage system that would be consistent with water quality control plans, the policies of which are expressed in City and State water quality regulations for the protection of water resources. Alternative 8, as with the Project, falls within the jurisdiction of water quality plan regulations that assure that development projects are in compliance with clean water policies. These plans and regulations include the LARWQB (Region 4) Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties; and the NPDES stormwater permitting program. In compliance with the City's LID requirements, Alternative 8, as with the Project, would install a capture and reuse system on each site. The detention would temporarily store the captured stormwater until the stored volume is entirely used through the irrigation system. The on-site drainage system would also provide BMPs in accordance with the City's LID requirements. As with the Project, impacts related to water quality control plans under Alternative 8 would be less than significant and similar to the Project.

(h) Land Use and Planning

As land use impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparisons of impacts of the

94 California Department of Water Resources, Division of Safety of Dams, Dam Inundation Map for Mulholland Dam, https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2, accessed March 15, 2020.

Alternative 8 apply to both the Project and the Project with the East Site Hotel Option.

Alternative 8 proposes up to 1,287,100 square feet of residential, office, and commercial floor area, with an approximate FAR of 6.973:1, and 33,105 square feet of publicly accessible open space. The Project proposes up to 1,287,150 square feet of residential and commercial floor area with an approximate FAR of 6.973:1.[95] As with the Project, to allow for development of Alternative 8, the zoning would need to be amended to C2-2-SN to eliminate the D Limitation, which limits FAR to 3:1 and 2:1 on certain parcels. As with the Project, Alternative 8 would require a Conditional Use Permit to allow FAR averaging to be calculated as a whole rather than by individual parcel or lot and for a residential density transfer between the West Site and East Site. As with the Project, Alternative 8 would not conflict with applicable 2016-2040 RTP/SCS goals to facilitate land use patterns that link land use and sustainable transportation options or the Framework Element Regional Center designation and policies that support a diversity of land uses, and provide for the spatial distribution of development that promotes a reduction of vehicle trips, VMT, and air pollution. Overall, similar to the Project, the density and location of Alternative 8 would not conflict with policies of local and regional land use plans adopted to avoid or mitigate environmental effects and, as such, impacts with respect to land use would be less than significant and similar to the Project.

(i) Noise

Maximum daily construction noise and vibration levels would be similar under the Project and the Project with the East Site Hotel Option. While the Project and the Project with the East Site Hotel Option would have nominally different daily operational mobile source noise levels, the impact conclusions, significance levels, and mitigation measures are the same for the Project and the Project with the East Site Hotel Option. Accordingly, the below comparisons of impacts of the Alternative 8 apply to both the Project and the Project with the East Site Hotel Option.

(i) Noise Levels in Excess of Standards

(a) Construction

Alternative 8 would require excavation for subterranean parking that would reach depths of 64 feet on the East Site and 60 feet on the West Site. Similar to the Project, maximum construction activities under Alternative 8 during most phases would increase noise levels at several sensitive receptor locations in the area. As with the Project, because the maximum amount of construction equipment operating simultaneously within the Project Site would be constrained by the size of the property, the maximum construction noise levels under Alternative 8 would be similar to the Project. Based on a conservative impact analysis, in which noise

[95] The Project with the East Site Hotel Option would provide 1,277,741 square feet of total floor area.

levels were calculated with all pieces of construction equipment operating simultaneously and located at the construction area nearest to the affected receptors, construction noise levels would exceed the applicable noise significance thresholds at several nearby noise sensitive receptors. Therefore, as with the Project, Alternative 8 would implement Mitigation Measures NOI-MM-1 to NOI-MM-3 to reduce construction noise impacts at off-site noise sensitive receptors to the extent technically feasible. However, as with the Project, with implementation of technically feasible mitigation, construction noise impacts at noise-sensitive receptors 1, 3, and 5 through 13 (eleven sites) would still exceed the significance threshold under Alternative 8. Therefore, as with the Project, construction noise impacts associated with on-site noise sources would remain temporarily significant and unavoidable for Alternative 8. Similar to the Project, maximum construction traffic would not result in significant noise levels (greater than 5 dBA L_{eq}) compared to existing traffic noise levels along any of the studied roadway segments. As with the Project, construction noise levels associated with on-site noise sources would be significant and unavoidable under Alternative 8. As Alternative 8 would result in a similar duration of construction activity, impacts related to construction noise would be similar to the Project.

(b) Operation

Alternative 8, as with the Project, would increase off-site traffic and generate on-site composite noise associated with fixed equipment, vehicle activity, and human outdoor activity. However, Alternative 8 would increase overall off-site vehicle trips per day from a maximum of 4,504 trips per day (Project with the East Site Hotel Option) to 5,336 trips per day under Alternative 8 (an approximately 19-percent increase); therefore, operational mobile source noise impacts would be greater under Alternative 8 than the Project with the East Site Hotel Option.[96] It is acknowledged that differences in off-site mobile source noise level increases along the studied roadway segments under the Project and the Project with the East Site Hotel Option would be negligible and less than 0.1 dBA CNEL for all analyzed roadway segments. Assuming a 19-percent increase in Alternative 8-related daily vehicle trips on the analyzed roadway segments, compared to the Project with the East Site Hotel Option, the maximum increase in Alternative 8-related traffic noise levels over Future (2040) traffic noise levels would be approximately 0.7 dBA CNEL (from 63.9 to 64.6 dBA CNEL) along Ivar Avenue between Hollywood Boulevard and Selma Avenue and would not exceed the significance threshold of a 5 dBA CNEL. Comparatively, the Project with the East Site Hotel Option (or the Project) would result in a 0.6 dBA increase along this same roadway segment in 2040. This difference in mobile source noise would not be perceptible and as such, traffic noise impacts under Alternative 8 would be less than significant and similar to the Project.

[96] Fehr and Peers, Alternatives Transportation Analysis, March 2020, Appendix R of this Draft EIR

Alternative 8 would also include a paseo that could host events of a similar type and size as the Project. As such, noise generated from the paseo under Alternative 8 would be similar to the Project. Similar to the Project, any outdoor performances under Alternative 8 would be subject the noise restrictions in NOI-PDF-3, which would limit noise levels from adversely affecting nearby noise sensitive receptors. Thus, noise, in general, generated from the paseo under Alternative 8 at off-site noise sensitive locations would be largely similar to the Project with the outdoor performance sound restrictions in place. As such, noise generated from the paseo under Alternative 8 would be similar or less than the Project when considering fewer on-site residents would attend these events under Alternative 8. Overall, composite operational noise levels would be less than significant and similar to the Project.

(ii) Groundborne Noise and Vibration

(a) Construction

Construction of Alternative 8, as with the Project, would generate groundborne construction vibration during construction activities when heavy construction equipment is used. As with the Project, the estimated vibration velocity levels from all construction equipment (maximum construction conditions) under Alternative 8 would be below the building damage significance criteria at off-site building structures west and east of the West Site and East Site construction areas. However, as with the Project, the estimated construction vibration levels under Alternative 8 would exceed the significance threshold at the Avalon Hollywood, the Pantages Theatre, the Yucca Street Art Deco Building Storefront, the AMDA Vine building, the Argyle House, the Commercial Building at 1718 Vine Street, the Capitol Records Building, and the Gogerty Building. Therefore, vibration impacts pursuant to the significance criteria for building damage would be significant. As with the Project, with implementation of Mitigation Measure NOI-MM-8 and compliance with LAMC Section 91.3307.1, vibration impacts associated with Alternative 8 would be reduced to less-than-significant levels for the Capitol Records and Gogerty Buildings. However, similar to the Project, because consent of off-site property owners, who may not agree, would be required to implement the vibration mitigation for potential structural damage to their off-site structures, it is conservatively concluded that structural vibration impacts on the AMDA Vine Building, the Argyle House, the Commercial Building at 1718 Vine Street, the Pantages Theatre, Avalon Hollywood, and Art Deco Building Storefront would remain significant and unavoidable because it cannot be assured that all components of NOI-MM-4 can be implemented.

Regarding human annoyance, as with the Project, the estimated vibration levels due to maximum construction activity at the West Site under Alternative 8 would exceed the significance threshold for human annoyance at vibration sensitive receptors near the Project Site. Implementation of Mitigation Measure NOI-MM-4 under Alternative 8, as with the Project, may lessen but would not reduce all

human annoyance impacts to a less-than-significant level. Therefore, as with the Project, no feasible mitigation measures under Alternative 8 would reduce the temporary vibration impacts from on-site construction associated with human annoyance at the vibration-sensitive receptors 3, 5, 6, and 8 through 13. As with the Project, construction vibration levels would be significant and unavoidable under Alternative 8. As Alternative 8 would result in a similar duration of construction activity, impacts related to construction vibration would be similar to the Project.

(b) Operation

Day-to-day operations under Alternative 8, as with the Project, would include typical commercial-grade stationary mechanical and electrical equipment, which would produce vibration at low levels that would not cause damage or annoyance impacts to on-site or off-site environment. Primary sources of transient vibration would include vehicle circulation within the proposed parking areas, which would be confined to the immediate area and would not be expected to be perceptible off the Project Site. It is anticipated that mechanical equipment, including air handling units, condenser units, and exhaust fans, under Alternative 8, as with the Project, would be located on building rooftops. Therefore, as with the Project, groundborne vibration from the operation of such mechanical equipment under Alternative 8 would not impact any of the off-site sensitive receptors. Impacts with respect to operational noise would be less than significant and similar to the Project.

(j) Population and Housing

During operation, the Project and the Project with the East Site Hotel Option would have different population, housing, and employment generation statistics. However, both development scenarios would result in the same impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of the Alternative 8 apply to both the Project and the Project with the East Site Hotel Option.

As with the Project, Alternative 8 would increase occupancy and use of the Project Site. Alternative 8 would provide 903 residential units, generating approximately 2,186 new residents.[97] Commercial uses under Alternative 8 (27,140 square feet) would generate approximately 184 employees.[98] Alternative 8's 386,347 square feet of office uses would generate approximately 1,665 new employees, for a total

97 Based on 2017 Census American Community Survey 5-Year Estimate data (2013–2017), www.census.gov/programs-surveys/acs/technical-documentation/table-and-geography-changes/2015/5-year.html, per correspondence with Jack Tsao, Housing Planner, Los Angeles Department of City Planning, July 31, 2019.

98 Based on HR&A Economic and Fiscal Impact Report evaluation in which the factor for the Project's retail/restaurant uses would be one employee per 146.5 square feet of floor area.

of 1,849 new employees.[99] By comparison, the Project would include 30,176 square feet of commercial uses, which would generate approximately 206 employees. The Project with the East Site Hotel Option, based on 130,278 square feet of hotel floor area would generate approximately 239 employees[100] and its commercial uses would generate approximately 206 new employees, for a total of approximately 445 employees. As with the Project, additional employees may be associated with on-site security and maintenance under Alternative 8.

Alternative 8 would generate a population increase of 2,186 new residents, which would represent approximately 0.90 percent of SCAG's 2018-2027 population growth projection of 241,442 and approximately 0.34 percent of SCAG's 2018-2040 population growth projection of 635,275. Alternative 8's 1,849 new employees would represent approximately 1.26 percent of SCAG's 2018-2027 employment growth projection of 146,255 and approximately 0.58 percent of SCAG's 2019-2040 employment growth projection of 320,375. Alternative 8, as with the Project, would not exceed SCAG's growth projections, would help the City meet its housing obligation under SCAG's RHNA allocation, and would provide the type of transit oriented development encouraged in the Los Angeles General Plan and SCAG 2016-2040 RTP/SCS policies. No existing residences would be displaced. As such, Alternative 8, as with the Project, would result in a less than significant population and housing impacts. Although Alternative 8 would not implement the objectives of SCAG's RHNA allocation or concentrate transit-oriented development to the same extent as under the Project, because SCAG population and housing projections would not be exceeded, impacts with respect to substantial unplanned population growth under Alternative 8 would be less than significant and similar to the Project.

(k) Public Services

During operation, the Project and the Project with the East Site Hotel Option would have different service-related population statistics, such as number of residents or students. However, both development scenarios would result in the same impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of Alternative 8 apply to both the Project and the Project with the East Site Hotel Option

(i) Fire Protection

Alternative 8, as with the Project, would involve construction activities and intensify the use of the Project Site so that it would increase demand on fire protection and emergency medical services, as well as potentially reduce emergency access.

99 Based on LAUSD employee generation rate of 0.00431 per square foot of high rise office uses (1,665 employees), and of 0.00271 per square foot of neighborhood shopping centers (73 employees).

100 Based on HR&A Economic and Fiscal Impact Report evaluation in which the factor for the Project's retail/restaurant uses would be one employee per 545 square feet of hotel floor area.

Alternative 8, as with the Project, would incorporate Project Design Feature TRAF-PDF-2 to provide a Construction Traffic Management Plan to improve vehicular access around the construction site. Project Design Feature TRAF-PDF-3 would identify and enforce parking location requirements for construction workers. The implementation of these Project Design Features would facilitate emergency access. As such, similar to the Project, construction under Alternative 8 would result in less-than-significant impacts with respect to emergency response times and emergency access.

During operation, Alternative 8 would result in a population increase of 2,186 new residents and 1,849 new employees, for a total service area increase of 4,035 in the service population.[101] By comparison, the Project would result in a population increase of 2,433 persons and 206 new employees. The Project with the East Site Hotel Option would result in a population increase of 2,140 persons and 445 employees. Alternative 8, as with the Project, would comply with the applicable OSHA, Building Code, Fire Code, other LAMC, and LAFD requirements and recommendations, which would reduce demand on LAFD facilities and equipment without creating the need for new or expanded fire facilities. In addition, the Project Site is located within a highly urbanized area accessed via an established street system and within the LAFD's maximum prescribed response distances. Due to urban proximity and facilitated travel for high priority emergency calls, impacts on emergency response would not be significant. Alternative 8, as with the Project, would also be consistent with LAMC fire flow requirements. As such, Alternative 8, as with the Project, would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. Impacts under Alternative 8, as with the Project, would be less than significant. However, because Alternative 8 would increase Project Site occupancy (employees plus residents) compared to the Project, impacts related to fire protection services under Alternative 8 would be greater than the Project.

(ii) Police Protection

Alternative 8, as with the Project, would result in construction and operation activities that could affect emergency access and increase demand for police protection services. As with the Project, Alternative 8's construction phase, although of shorter duration than that of the Project, could increase potential demand for LAPD services related to theft or vandalism and increased worker activity, as well as construction traffic that could affect emergency response times. To reduce LAPD demand during construction, Alternative 8, as with the Project, would implement a number of security measures under Project Design Feature POL-PDF-1 to limit access to construction areas, including private security,

[101] Based on Citywide occupancy of 2.34 resident per household and LAUSD employee factors of 0.00431 employee per square foot of high rise office uses.

construction fencing, and locked entry. Similar to the Project, construction activities under Alternative 8 may involve temporary lane closures or increase travel time due to flagging or stopping traffic to accommodate trucks entering and exiting the Project Site. Under Project Design Feature TRAF-PDF-2, a Construction Traffic Management Plan would ensure that adequate and safe access remains available at the Project Site during construction activities. Project Design Feature TRAF-PDF-3 would implement a Construction Worker Parking Plan to identify and enforce parking location requirements for construction workers. As with the Project, most construction staging for Alternative 8 would occur on the Project Site, and construction workers would generally start and end their work days in advance of peak traffic hours, thus, reducing their potential effect on traffic and emergency response times. Furthermore, construction-related traffic generated by Alternative 8, as with the Project, would not significantly impact LAPD response times within the Project vicinity as LAPD vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic during construction.

According to LAPD service population generation factors,[102] assuming that 85 percent of Alternative 8's 903 residential units (768 units) were one- and two-bedroom, which would generate an estimated service population gain of 2,304 residents, and 15 percent of Alternative 8's 903 units (136 units) were three-bedroom or more, which would generate a gain of 544 residents, Alternative 8 would result in a gain of 2,848 in residential service population. Alternative 8 would generate 1,849 employees. In total, Alternative 8 would increase the LAPD service population by 4,697. As discussed in Section IV.K.2, *Police Protection*, LAPD does not provide crime rates for non-resident population. However, the analysis of impacts to police services to be conservative, evaluates the residential and non-residential populations as requiring police protection services. Thus, the analysis utilizes a generation factor of 15 crimes per 1,000 service population to determine the number of crimes potentially occurring as part of the Project. Utilizing this same methodology and crime factors as for the Project, the increase in service population (i.e., employees and residents) generated by Alternative 8 could result in 71 crimes per year.[103] In comparison the Project and the Project with the East Site Hotel Option would result in 49 and 48 crimes per year, respectively.

The LAPD determines the need for new officers based on a variety of non-definitive factors (i.e., shifts in station and/or patrol boundaries, ongoing staff changes, service populations and crime statistics may be considered when new officers are hired). Alternative 8, as with the Project, would incorporate Project Design Feature POL-PDF-2 to provide a 24-hour/seven-day security program to ensure the safety of its employees and site visitors. These measures would reduce demand on police services during operation. Similar to the Project, with the implementation of these

102 LAPD service population generation factors are: 3 residents per one- and two-bedroom units, 4 residents per three-bedroom unit, and 3 residents per kfs commercial floor area.

103 Crime total rounded up to next whole number.

features, Alternative 8 would not increase police services demand to the extent that the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, Alternative 8, as with the Project, would not result in potential physical impacts associated with construction of police facilities, and impacts with respect to police protection would be less than significant. However, as crime rates and site occupancy would be greater, impacts to police protection services under Alternative 8 would be greater than the Project.

(iii) Schools

LAUSD has student generation rates for residential, office, and commercial uses within their 2018 Developer Fee Justification Study. Based on these rates, Alternative 8 would generate approximately 417 elementary school students, 116 middle school students, and 240 high school students totaling 773 students.[104,105,106] The Project would generate approximately 441 students and the Project with the East Site Hotel Option would provide residential and commercial uses that could generate 424 students. Similar to the Project, the additional students generated by Alternative 8 could potentially exceed the number of seats available at local schools. However, pursuant to Section 65995 of the California Government Code, the Project Applicant would be required to pay fees in accordance with SB 50. Payment of such fees is intended for the general purpose of addressing the construction of new school facilities, whether schools serving the Project are at capacity or not and, pursuant to Section 65995(h), payment of such fees is deemed to be full mitigation of a project's development impacts. As such, impacts to school facilities and services under Alternative 8 would, as with the Project, would be less than significant. However, because Alternative 8 would generate more school-age children than the Project, impacts on schools would be greater than the Project.

(iv) Parks and Recreation

Alternative 8 would generate approximately 2,186 new residents that would utilize parks and recreation facilities. In contrast, the Project and the Project with the East Site Hotel Option would generate approximately 2,433 new residents and 2,140 residents respectively. Alternative 8, as with the Project, would comply with LAMC Section 21.10.3, which requires a dwelling unit construction tax of $200 for each

104 Student generation rates per household for residential uses are based on Table 3 of the LAUSD 2018 Developer Fee Justification Study: Elementary = 0.2269; Middle School = 0.0611; High School = 0.1296

105 For the restaurant/retail uses, the student generation rate of 0.610 student per 1,000 square feet is based on the Neighborhood Shopping Centers rate as provided in Table 15 of the LAUSD 2018 Developer Fee Justification Study. The students are distributed as follows: 54 percent elementary school, 15 percent middle school, and 31 percent high school.

106 For the office uses, the student generation rate of 0.969 student per 1,000 square foot is based on the Large High Rise Commercial Office rate Table 15 of the LAUSD 2018 Developer Fee Justification Study. The students are distributed as follows: 54 percent elementary school, 15 percent middle school, and 31 percent high school.

new residential unit for City acquisition of new park space. Furthermore, Alternative 8, as with the Project, would meet the requirements of LAMC Sections 12.21 and 17.12, and 21.10.3(a)(1) regarding the provision of useable open space. Although Alternative 8, as with the Project, would not meet the parkland provision goals set forth in the PRP, which recommends 2.0 acres each of neighborhood and community recreational sites and facilities per 1,000 residents and 6.0 acres of regional recreational sites and facilities per 1,000 residents, these are Citywide goals and are not intended to be requirements for individual development projects. Thus, similar to the Project, operation of Alternative 8 would not exacerbate the existing shortfalls in parkland relative to City standards to the extent that new or physically altered park or recreational facilities would need to be constructed, the construction of which would cause significant adverse physical environmental impacts. Similar to the Project, impacts with respect to parks and recreation would be less than significant under Alternative 8. However, since Alternative 8 would generate less population and a proportionate decrease in demand for park space than the Project, impacts would be less than the Project. Under the Project with the East Site Hotel Option, there would be fewer residents than under Alternative 8. Thus, impacts to parks and recreation facilities under Alternative 8 would be greater than the Project with the East Site Hotel Option.

(v) Libraries

Alternative 8's residential population, as with the Project, would increase demand for library services. The LAPL has indicated they have no plans for a new branch library in the Project vicinity. As with the Project, there are also three libraries within one-mile of the of the Project Site which could serve Alternative 8. Furthermore, in consideration of the Project's ability to provide internet service, generate revenue to the City's General Fund, and LAPL's ongoing expansion and availability of online resources, similar to the Project, Alternative 8's increase in demand to any one local library would not be expected to result in a substantial increase in demand that would necessitate new or physically altered facilities. Therefore, similar to the Project, Alternative 8 would not create the need for new or physically altered library facilities, the construction of which would result in substantial adverse physical environmental impacts, in order to maintain acceptable service ratios or objectives. Therefore, as with the Project, impacts to libraries under Alternative 8 would be less than significant. However, because Alternative 8 would generate less population, impacts relative to libraries would be less than the Project. Under the Project with the East Site Hotel Option, there would be fewer residents than under Alternative 8. Thus, impacts to library facilities under Alternative 8 would be greater than the Project with the East Site Hotel Option.

(l) Transportation

During operation, the Project and the Project with the East Site Hotel Option would have different overall VMT and VMT per capita statistics. However, both development scenarios would result in the same transportation-related impact

conclusions and impact significance levels. Accordingly, the below comparisons of impacts of the Alternative 8 apply to both the Project and the Project with the East Site Hotel Option.

(i) Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities

Alternative 8, as with the Project, would support multimodal transportation options and a reduction in VMT, as well as promote transportation-related safety in the Project area. Alternative 8, as with the Project, would not conflict with policies of Mobility Plan 2035 and the City of Los Angeles Complete Streets Design Guide, adopted to protect the environment and reduce VMT. Similar to the Project, Alternative 8 would also be consistent with applicable transportation goals of the Hollywood Community Plan and the Hollywood Redevelopment Plan. Project Design Feature TRAF-PDF-1 under Alternative 8, as well as the Project, would implement a TDM Program to address parking, transit, commute trip reductions, shared mobility, bicycle use, and pedestrian access, and TDM management strategies. TDM measures to promote bicycle use include bicycle parking spaces, bike lockers, and showers for residents, employees, and visitors. Alternative 8, as with the Project, would not conflict with VisionZero to reduce traffic-related deaths; with LAMC Section 12.37 regarding street standards; with LADOT MPP, Section 321, regarding driveway design standards, or with the 1988 Hollywood Community Plan's Objective 6 to coordinate land use densities and to promote the use of transit. Alternative 8, as with the Project, would increase population density in close proximity to the Metro Red Line Hollywood/Vine Station, other regional Metro bus lines, and the LADOT DASH lines. Alternative 8, as with the Project, would also provide for road and pedestrian improvements, including a paseo linking the West Site and East Site and new median improvements along Vine Street, which would enhance pedestrian safety. A signalized mid-block crosswalk is proposed across Argyle Avenue to help facilitate local pedestrian circulation and access by maintaining a path of east-west travel with the existing mid-block crosswalks across Ivar Avenue and Vine Street. Similar to the Project, Alternative 8 would not conflict with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities and, as such, impacts relative to plans and programs would be less than significant and similar to the Project.

(ii) Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)

As required under CEQA Guidelines Section 15064.3(b) and based on proposed land uses, floor areas, and TDM measures incorporated under Project Design Feature TRAF-PDF-1 (Transportation Demand Management Program), VMT standards would be applicable to Alternative 8, as well as the Project. Alternative

8 would have a household VMT of 4.5 per capita and a work VMT of 4.7 per employee.[107] The Project would have a household per capita VMT of 4.8 and is exempt from retail VMT. The Project with the East Site Hotel Option would have a work VMT of 4.8 and a household VMT of 4.7 per capita. These rates are all below the thresholds of significance proposed for the City's Central APC household per capita of 6.0 and work VMT of 7.6. per employee. Thus, similar to the Project, impacts under Alternative 8 would be less than significant. Alternative 8's comparative household and work VMT per capita rates are lower than the Project's, and as such, impacts with respect to CEQA Guidelines Section 15064(b) are considered to be less than the Project.

(iii) Design Hazards

Alternative 8, as with the Project, would reduce existing curb cuts and provide new sidewalks around the perimeter of the Project Site. As with the Project, improvements under Alternative 8 would include a signalized mid-block crosswalk provided across Argyle Avenue to help facilitate local pedestrian circulation and access. As with the Project, Alternative 8 would provide a paseo through the Project Site between Argyle Avenue and Ivar Avenue. Alternative 8, as with the Project, would eliminate driveway crossings on Vine Street. Access to the Capitol Records Complex (including both the Capitol Records Building and the Gogerty Building) would continue to be provided via the existing driveway on Yucca Street. Similar to the Project, total existing curb cuts would be reduced from 12 total to a total of five. The driveways would not require the removal or relocation of existing passenger transit stops, and would be designed and configured to avoid potential conflicts with transit services and pedestrian traffic. Alternative 8, as with the Project, would not substantially increase hazards, vehicle/pedestrian conflict, or preclude City action to fulfill or implement projects associated with these networks. Similar to the Project, Alternative 8 would contribute to overall walkability through enhancements to the Project Site, streetscape, and crossing of Argyle Avenue, and would not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. Impacts under Alternative 8 would be less than significant and similar to the Project.

(iv) Emergency Access

The Project Site is located in an established urban area served by the surrounding roadway network, and multiple routes exist in the area for emergency vehicles and evacuation. Drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Similar to the Project, no policy or procedural changes to an existing risk management plan, emergency response plan, or evacuation plan would be required due to implementation under Alternative 8. All driveways and the internal circulation would be subject to LAFD review to confirm adequate

107 Fehr and Peers, Alternatives Transportation Analysis, March 2020, Appendix R of this Draft EIR.

access is provided internally for on-site emergency vehicle access. With review and approval of Project Site access and circulation plans by the LAFD, Alternative 8, as with the Project, would not impair implementation of or physically interfere with adopted emergency response or emergency evacuation plans. Impacts regarding emergency access under Alternative 8 would be less than significant and similar to the Project.

(m) Tribal Cultural Resources

As tribal cultural resources impacts would be essentially the same under the Project and the Project with the East Site Hotel Option, the below comparison of impacts of Alternative 4 apply to both the Project and the Project with the East Site Hotel Option.

The City complied with AB 52 in its consultation and records searches conducted through SCCIC and the NAHC for the Archaeological and Paleontological Resources Assessment. The research indicated no known tribal cultural resources within the Project Site or surrounding area. However, as with the Project excavations associated with Alternative 8 could have a potential, albeit a low potential, to encounter previously unknown and buried tribal cultural resources. However, similar to the Project, in the event that buried tribal cultural resources are encountered during construction under Alternative 8, the Project Applicant will be required to comply with the City's standard Conditions of Approval for the treatment of inadvertent Tribal cultural resource discoveries. With compliance, Alternative 8, as with the Project, would result in less-than-significant impacts to tribal cultural resources. As excavation depths would be similar, impacts to tribal cultural resources under Alternative 8 would be similar to the Project.

(n) Utilities and Service Systems – Water, Wastewater, and Solid Waste

During operation, the Project and the Project with the East Site Hotel Option would have different utility demand statistics (i.e., water demand, wastewater generation, and solid waste generation). However, both development scenarios would result in the same impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of the Alternative 8 apply to both the Project and the Project with the East Site Hotel Option.

(i) Wastewater

Alternative 8 would generate additional wastewater and increase demand on the existing Hyperion Treatment Conveyance System and Hyperion Treatment Plant. **Table V-14**, *Alternative 8 Wastewater Generation During Operation*, summarizes Alternative 8's approximate wastewater generation. Table V-14 assumes that 45 percent of Alternative 8's 903 residential units would be one-bedroom, 40 percent would be two-bedroom units, and 15 percent would be three-bedroom units, and that indoor amenities, spa/health club, retail/restaurant space, and swimming pool

areas would be similar to those of the Project. Restaurant/retail space would be reduced from 30,176 square feet to 27,140 square feet (a reduction of approximately 10 percent) compared to the Project.

As shown in Table V-14, Alternative 8 is estimated to generate approximately 308,843 gpd, or 0.308 mgd.[108] The Project is estimated to increase on-site wastewater generation by 311,680 gallons per day gpd, or approximately 0.312 mgd and the Project with the East Site Hotel Option is anticipated to generate 322,067 gpd, or approximately 0.322 mgd. These estimates do not account for reductions in wastewater generation that would occur with implementation of conservation measures. Similar to the Project, the increase in wastewater generation by Alternative 8 would be within the capacity limits of the conveyance and treatment facilities serving the Project Site. Similar to the Project, impacts on wastewater conveyance and treatment systems under Alternative 8 would be less than significant. However, because Alternative 8 would generate a lower volume of wastewater, impacts under Alternative 8 would be less than the Project.

TABLE V-14
ALTERNATIVE 8 WASTEWATER GENERATION DURING OPERATION

Land Use	Units	Generation Rate (gpd/unit)[a]	Total Wastewater Generation (gpd)
Residential: Apartment – 1 Bedrooms	406 du	110/du	44,660
Residential: Apartment – 2 Bedrooms	362 du	150/du	54,300
Residential: Apartment – 3 Bedrooms	135 du	190/du	25,650
Offices	386,347 sf	0.17/sf	65,679
Retail/Restaurant Lobbies	16,248 sf	50/1,000 sf	658
Restaurant: Full Service Indoor Seat[b]	1,108 seats	30/seat	33,240
Indoor Amenities[c]	23,916 sf	50/1,000 sf	1,196
Health Club/Spa	9,337 sf	650/1,000 sf	6,069
Swimming Pools[d]	10,165 cf	7.4805/cf	76,036
Cooling Towers	7,971 sf	170/1,000 sf	1,355
		Total	**308,843 gpd**

Acronyms: du = dwelling units; sf = square feet, gpd = gallons per day, cf = cubic feet

[a] The generation rates are based on the LASAN sewerage generation factors. Alternative 8's 507 units are assumed to be approximately half one-bedroom and half two-bedroom.

[b] To calculate the number of seats, 1 seat per 15 sf was assumed.

[c] The lounge use includes would include a library, multipurpose rooms, kid rooms, and general amenity space.

[d] Based on two swimming pools.

SOURCE: ESA, 2020.

108 As shown in Table V-14, the total amount of wastewater generation for swimming pools is 76,036 gpd. This circumstance would occur only if the swimming pools were all drained on any given day. Daily wastewater generation for the swimming pools would typically be less than approximately 500 gallons per day. As such, this analysis is conservative in presenting the maximum wastewater generation scenario for swimming pools.

(ii) Water Supply

Alternative 8 would increase demand on water supplies and infrastructure. Alternative 8 would increase demand on water supplies and infrastructure. Based on wastewater generation factors shown in Table V-14, residential, commercial, office, and recreational uses provided under Alternative 8 would generate a maximum day water demand of approximately 308,843 gpd, which includes water demand from draining the pools entirely. However, draining the pools would occur very infrequently and on average over the course of a year, pool-related water demand would average less than approximately 500 gallons per day. Thus, the water demand analysis below is based on this average pool daily water demand to provide a reasonable assessment of yearly water demand. Additional water would be required for landscaping and indoor parking structure space. As under the Project, landscaping would require approximately 2,227 gpd. Parking would increase from approximately 1,521 spaces under the Project to 2,337 spaces under Alternative 8. As such, parking space water demand is expected to increase from 445 gpd under the Project by approximately by approximately 54 percent to approximately 683 gpd. Alternative 8's water maximum daily demand is estimated to be 311,753 gpd prior to water conservation measures. Water conservation measures under the City's Ordinance No. 184,248, the 2017 Los Angeles Plumbing Code, and the 2017 Los Angeles Green Building Code, and implementation of the Applicant's water conservation efforts and Project Design Feature WS-PDF-1 would result in a savings of approximately 39 percent (as assumed for the Project as well and excludes swimming pools). Assuming a water demand of 500 gallons per day for the swimming pool, Alternative 8's average daily water demand would be would typically be less than approximately 144,287 gpd (162 afy).[109]

In comparison, the Water Supply Assessment for the Hollywood Center Project indicated the Project and the Project with the East Site Hotel Option would have a water demand of 163,098 gpd (~183 afy) and 182,896 gpd (~205 afy), respectively, accounting for water conservations and compliance with applicable regulations.[110] Similar to the Project, Alternative 8's water demand projections would be within LADWP's 2015 UWMP's projected increases in Citywide water demands, while anticipating multi-dry year water conditions through the planning horizon of 2040.

Furthermore, similar to the Project, operation of Alternative 8 would require new connections from existing facilities. With regulatory compliance to the LAMC and coordination with LADWP, operation of Alternative 8, as with the Project, would not result in the relocation or construction of new or expanded water facilities, the construction or relocation of which would cause significant environmental effects.

109 Alternative 8 Land Uses from Table V-14 excluding pools (232,807 gpd) + Landscaping (2,227 gpd) + Indoor Parking (683 gpd) = 235,717 gpd. Then, 61% X 235,717 gpd = 143,787 gpd. Then, 143,787 gpd + 500 gpd (pools) = 144,287 gpd.

110 LADWP, WSA for the Hollywood Center Project, December 11, 2018, pp. 11 and 12. Provided in Appendix P-2 of this Draft EIR.

Similar to the Project, operational impacts on water infrastructure under Alternative 8 would be less than significant.

Based on the above, while Alternative 8 and the Project would result in less-than-significant water supply and infrastructure impacts, because Alternative 8 would result in less average daily water demand compared to the Project, impacts under Alternative 8 would be less than the Project.

(iii) Solid Waste

Alternative 8 would increase solid waste generation at the Project Site that would need to be landfilled. Construction of the Project would generate an estimated 691,269.18 gross tons of C&D waste. Due to similar floor areas, the construction of Alternative 8 would generate approximately the same construction waste as under the Project. The maximum construction waste under the Project would represent a small fraction of the available capacity of the County's Azusa Land Reclamation landfill or one of the inert debris engineered fill operations in Los Angeles County. As such, impacts associated with construction under the Project and Alternative 8 would be less than significant and similar.

During operation, Alternative 8's 903 residential units would generate approximately 11,134 pounds of solid waste per day (based on 12.33 pounds per day per unit) or approximately 2,032 tons per year (5.56 tpd).

During operation, Alternative 8's 1,849 employees would generate approximately 19,470 pounds of solid waste per day (based on 10.53 pounds per day per employee) or approximately 3,553 tons per year. After implementation of the City's 65-percent diversion rate, Alternative 8 would generate approximately 1,244 tons per year (3.41 tpd) requiring landfill disposal per year. The Sunshine Canyon Landfill, the primary recipient of Class III solid waste from the City, has a maximum daily capacity of 12,100 tpd and a disposal rate of 6,765 tpd, indicating a residual daily capacity of 5,335 tpd. Alternative 8's addition of 3.99 tpd[111] landfill disposal rate would represent 0.07 percent of Sunshine Canyon's residual daily capacity, assuming diversion.

By comparison, the Project, which would have a higher disposal rate than the Project with the East Site Hotel Option, would generate approximately 2,639 tons of solid waste requiring landfill disposal per year and approximately 7.23 tons of solid waste per day. After implementation of the City's 65-percent diversion rate, the Project would generate approximately 923.65 tons of solid waste per year or 2.53 tons of solid waste per day, which would be 2.96 tpd landfill disposal rate.

111 Alternative 8's daily disposal in tons assumes that landfills operate six days per week; 52 weeks * 6 days = 312 days. Therefore, the daily disposal is calculated by 1,244 tons / 312 days = 3.99 tpd.

Similar to the Project, Alternative 8's additional solid waste generation would be accommodated by the County's City-certified waste processing facilities. As with the Project, Alternative 8's 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. Similar to the Project, impacts with respect to solid waste under Alternative 8 would be less than significant. However, because Alternative 8 would increase solid waste compared to the Project, impacts under Alternative 8 would be greater than the Project.

(o) Energy Conservation and Infrastructure

During operation, the Project and the Project with the East Site Hotel Option would have different energy consumption statistics. However, both development scenarios would result in the same impact conclusions and impact significance levels. Accordingly, the below comparisons of impacts of the Alternative 8 apply to both the Project and the Project with the East Site Hotel Option.

(i) Efficient Energy Consumption

Alternative 8, as with the Project would incorporate energy-conservation measures beyond regulatory requirements as specified in Project Design Features GHG-PDF-1 and WS-PDF-1. These require USGBC LEED Gold Certification energy performance optimization features such as reducing building energy cost by a minimum of 11.6 percent for new construction compared to the 2019 Title 24 Building Energy Efficiency Standards and installing energy efficient appliances. Alternative 8's proposed residential buildings on the West Site would incorporate LEED Gold Certification, as with the Project, and the proposed office building would combine LEED Platinum (the highest level of LEED Certification) and WELL Gold Certification. As with the Project, Alternative 8 would comply with and exceed existing minimum energy efficiency requirements, such as the Title 24 standards and CALGreenCode, including for building rooftops to be solar-ready so that on-site solar photovoltaic or solar water heating systems could be installed in the future. Alternative 8, as with the Project, would be designed to exceed ASHRAE 90.1-2010 standards by more than 20 percent through the use of efficient heating, ventilation, and HVAC systems and a high-performance building envelope. Indoor air quality would be enhanced through the selection of low-VOC emitting materials, and exhaust systems would be utilized for optimal ventilation in both kitchens and bathrooms.

Alternative 8, as with the Project, would be consistent with and not conflict with SCAG's land use type for the area and would encourage alternative transportation, and achieve a reduction in VMT resulting in a transportation efficiency level better than the Hollywood neighborhood and City and statewide average.

Based on energy consumption modeling for Alternative 8, natural gas usage in Alternative 8 would be approximately 10 percent higher and approximately 2

percent higher when compared to the Project and the Project with the East Site Hotel Option, respectively.[112] Electricity usage would be approximately 63 percent higher and approximately 56 percent higher when compared to the Project and the Project with the East Site Hotel Option, respectively. Despite the differences in energy consumption, Alternative 8, as with the Project would not cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation and, as such, impacts related to efficient energy consumption would be less than significant. As both would similarly comply to applicable efficient energy consumption regulations, impacts under Alternative 8 would be similar to the Project.

(ii) Conflict with Plans for Renewable Energy or Energy Efficiency

Alternative 8, as with the Project, would comply with existing energy standards, would include a project design and building operation that would incorporate energy-conservation measures beyond those otherwise required, and would not conflict with adopted energy conservation plans. Alternative 8, as with the Project, would implement energy conservation measures, and incorporate heat island reduction strategies, such as high-reflectance and vegetated roofs, provide water efficient fixtures and landscaping to reduce indoor water usage, and HVAC systems that would be sized and designed in compliance with the CALGreen Code to maximize energy efficiency caused by heat loss and heat gain. Alternative 8, as with the Project, would have the same automobile fuel efficiencies associated with access to alternative modes of transportation. By exceeding the regulatory standards, similar to the Project, Alternative 8 would have a less-than-significant impact regarding the provisions of plans for renewable energy and energy efficiency. As Alternative 8 would be in compliance with plans for renewable energy and energy efficiency, impacts under Alternative 8 would be similar to the Project.

(iii) Relocation or Expansion of Energy Infrastructure

Alternative 8, as with the Project, would utilize energy infrastructure to accommodate respective demand for energy resources. Similar to the Project, Alternative 8's electricity and natural gas demand is expected to represent a small fraction of LADWP and SoCalGas energy supplies and the service provider's existing infrastructure. Planned electricity and natural gas supplies would be sufficient to meet the Project's demand for electricity and natural gas. As with the Project, Alternative 8 would not result in an increase in demand for electricity or natural gas services that exceeds available supply or distribution infrastructure that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

112 Refer to Appendix R, Alternative Analyses, for CalEEMod operational energy demand worksheets for Alternative 8.

Impacts under Alternative 8 would be less than significant and similar to the Project.

(3) Relationship of the Alternative to Project Objectives

As described above, Alternative 8, the Mixed Office and Residential Alternative, would consist of a 17-story office building on the East Site and two residential buildings on the West Site (48 stories and 13 stories), with both the West and East sites incorporating ground floor commercial uses. Proposed land uses include 770 market rate residential units, 133 senior affordable units, and 27,140 square feet of commercial uses, and 386,347 square feet of office uses. Alternative 8 would provide 33,105 square feet of publicly accessible open space, would have the same floor area and FAR (6.973:1) as the Project, and would allow for broad setbacks between the East Office Building and the Capitol Records Building, as under the Project. Because of its density of uses, design, open paseo, and building standards, and lower household VMT per capita (4.5) and work VMT per employee (4.7), Alternative 8 would substantially meet all of the Project Objectives:

1. Redevelop the Project Site, with a mixed-use development that protects the architectural and historical heritage of the Capitol Records Complex and activates Hollywood Boulevard, Vine Street, and surrounding streets through connected, publicly available landscaped open space, including a paseo with shopping, seating, open air dining, and art installations, and plazas accommodating performances and community focused events.

2. Create a hub of activity surrounding the Capitol Records Complex and the intersection of Hollywood Boulevard and Vine Street, by activating the eastern end of Hollywood Boulevard and the terminus of the Hollywood Walk of Fame, to increase engagement with the Capitol Records Complex.

3. Develop architecturally distinct buildings that are compatible with the Capitol Records Complex through a design that responds to the Capitol Records Building's modernist architectural character, and preserve views of the Capitol Records Building.

4. Maintain prominent views of the Capitol Records Building by providing building setbacks, visual buffers, open space between the Project's new buildings and the Capitol Records Complex, and safe public viewing areas from the proposed paseo and plazas, to maximize view corridors and continue showcasing its distinctive architectural design.

5. Promote local, regional, and State land use and mobility objectives and reduce vehicle miles traveled (VMT) by maximizing infill development within an existing Regional Center near jobs, retail, and entertainment in proximity to transit and transportation infrastructure that encourages pedestrian activity.

6. Provide affordable senior housing with outdoor spaces in proximity to public transportation, allowing an age-specific demographic to continue to live in their residence of preference while maintaining access to services and goods.

7. Cluster jobs and housing near transit by locating a high-density, mixed-use development within a Transit Priority Area.

8. Support the growth of the City's economic base through the introduction of an economically viable project which creates a significant number of construction and permanent jobs.

9. Activate the Hollywood area with commercial opportunities that could serve local employees, generate local tax revenues, and provide new permanent jobs and housing for residents in support of local business.

10. Incorporate sustainable and green building design and construction to promote resource conservation, including waste reduction, efficient water management techniques, and conservation of energy to achieve a LEED-Gold equivalent building.

7. Environmentally Superior Alternative

As the alternatives analyses relative to the Project and the Project with the East Site Hotel Option would be mostly similar, except as noted in the applicable analyses above, the below discussion applies to both the Project and the Project with the East Site Hotel Option.

Section 15126.6(e)(2) of the State CEQA Guidelines indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR and that if the “no project” alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives.

Selection of an environmentally superior alternative is based on comparison of the alternatives to determine which among the alternatives would reduce or eliminate the impacts associated with the Project to the greatest degree. The comparative impacts of the Project and the Project Alternatives are summarized in **Table V-15**, *Comparison of Impacts Associated with the Alternatives and the Project*, below. The comparisons apply to the Project and the Project with the East Site Hotel unless, noted otherwise.

Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project/No Build Alternative, would be considered the environmentally superior because it would not involve new development and assumes on-site uses would continue to operate similar to existing conditions. Although Alternative 1 would not meet any of the Project Objectives, it would avoid all of the Project’s significant impacts, including the Project’s significant and unavoidable construction noise and vibration impacts

and associated significant unavoidable vibration impacts to historical resources. However, because the No Project/No Build alternative has been identified as the environmentally superior alternative, identification of another environmentally superior alternative is required.by the CEQA Guidelines.

As shown in Table V-15, Alternative 2, the Development under Existing Zoning Alternative, and Alternative 5, the Proposed Community Plan Update-Compliant Alternative, would reduce the most Project impacts, the majority of which are less-than-significant impacts. Overall, Alternative 2 would reduce several more impact areas compared to Alternative 5. As these Alternatives would consist of a lower scale of development with respect to total floor area and residential units compared to the Project, they would particularly reduce the Project's less-than-significant impacts related to public services and utilities where the magnitude of impacts are associated with population increases.

As Alternatives 2 and 5 would require site clearance, excavation, and foundation development as with all the proposed build alternatives, Alternatives 2 and 5 would exceed threshold standards for noise and vibration. Accordingly, temporary noise and vibration impacts during certain phases of construction under the Project and all the build alternatives cannot be mitigated to less-than-significant levels because of the proximity of off-site noise and vibration sensitive uses. However, because of their smaller size, construction-related impacts would be of shorter duration.

Alternative 3, the Reduced Maximum Height Alternative, would also reduce many of the Project's less-than-significant impacts but without as many reductions in impacts as Alternatives 2 and 5. Alternative 3 would also result in greater impacts than the Project with the East Site Hotel Option with respect to Parks/Recreation and Library Facilities.

Alternative 6, the Above-Grade Parking Alternative, would also reduce many of the Project's impacts associated with the proposed excavation, while increasing effects related to Aesthetics (scenic vistas) and impacts with respect to Transportation (conflicts with programs, plans, ordinances or policies addressing the circulation system and alternative transportation facilities).

Alternatives 4 and 7 would both result in greater impacts associated with: Air Quality (consistency with plans, cumulative increases in criteria pollutants-operation, and carbon monoxide hotspots); GHG (emissions and plan consistency); Hazards (emergency responses plans); Population and Housing; Public Service (Fire Protection and Schools); and Utilities (Solid Waste). Alternative 4 would also have greater impacts regarding Transportation (VMT). Alternative 7's additional greater impacts include Aesthetics (scenic vistas) and Transportation (conflicts with programs, plans, ordinances or policies addressing the circulation system and alternative transportation facilities).

Alternative 8 would reduce some of the Project impacts but would also cause impacts to be greater than the Project with the respect to Air Quality (criteria pollutants-operation, localized emissions, and carbon monoxide hotspots); GHG (emissions); Hazards (emergency responses plans); Public Service (Fire Protection, Police Protection, and Schools); and Utilities (Solid Waste). Also, under Alternative 8, impacts regarding Public Services (Parks/Recreation and Library Facilities) would be greater than the Project with the East Site Hotel Option.

In conclusion, because Alternative 2 would result in the most reduction of impacts compared to the Project, it is considered to be the Environmentally Superior Alternative.

Project Objectives are summarized in **Table V-16,** *Ability of Alternatives to Meet Project Objectives*. As shown in Table V-16, Alternatives 2 through Alternative 7, because of either their mix of uses, scale of development, above-grade parking structures, or other factors, only partially meet some of the Project Objectives (i.e., to a lesser extent than the Project). Additionally, by not including any senior affordable units, Alternatives 2, 4, and 7 would not meet Project Objective No. 6. Conversely, the design, mix of uses, and density of Alternative 8 would meet all Project Objectives.

TABLE V-15
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Use or Feature	Project	Project With the Hotel Option	Alternative 1: No Project/No Build Alternative	Alternative 2: Development under Existing Zoning	Alternative 3: Reduced Maximum Height	Alternative 4: Office, Hotel and Commercial	Alternative 5: Proposed Community Plan Update-Compliant	Alternative 6: Above-Grade Parking	Alternative 7: Primarily Office	Alternative 8: Office, Residential, and Commercial
Aesthetics										
Scenic Vistas	No Impact	No Impact	Less (No Impact)	Less (No Impact)	Similar (No Impact)	Similar (No Impact)	Similar No Impact)	Greater (No Impact)	Greater (No Impact)	Similar (No Impact)
Scenic Resources	Ni Impact	No Impact	Less (No Impact)	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)	Similar(No Impact)
Regulations Governing Scenic Quality	Less than Significant	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Light and Glare	No Impact	No Impact	Less (No Impact)	Less (No Impact)	Less (No Impact)	Less (No Impact)	Less (No Impact)	Similar (No Impact)	Less (No Impact)	Similar (No Impact)
Air Quality										
Consistency or Conflict with Air Quality Management Plan	Less than Significant	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)	Similar (Less than Significant)
Cumulative Increase of Criteria Pollutants - Construction	Less than Significant with Mitigation	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation	Less (Less than Significant with Mitigation	Similar (Less than Significant with Mitigation)
Cumulative Increase of Criteria Pollutants Operation	Less than Significant with Mitigation	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Greater (Less than Significant) with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant) with Mitigation	Greater (Less than Significant) with Mitigation	Greater (Less than Significant with Mitigation)

TABLE V-15
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Exposure of Sensitive Receptors to Pollutant Concentrations - Localized Emissions	Less than Significant	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)
Exposure of Sensitive Receptors to Pollutant Concentrations- Carbon Monoxide Hotspots	Less than Significant	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Greater (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Greater Less than Significant	Greater (Less than Significant)
Exposure of Sensitive Receptors to Pollutant Concentrations - Toxic Air Contaminants Construction	Less than Significant with Mitigation	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant) with Mitigation	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Exposure of Sensitive Receptors to Pollutant Concentrations - Toxic Air Contaminants Operation	Less than Significant	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Other Emissions Affecting a Substantial Number of People	Less than Significant	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)

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Cultural Resources										
Historical Resources	Significant and Unavoidable with Mitigation	Significant and Unavoidable with Mitigation	Less (No Impact)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)	Similar (Significant and Unavoidable with Mitigation)
Archaeological Resources	Less than Significant with Mitigation	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Human Remains	Less than Significant	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Geology and Soils										
Seismic Hazards	Less than Significant	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Soil Erosion or Loss of Topsoil	Less than Significant	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Unstable Geologic Units	Less than Significant	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Expansive Soils	Less than Significant	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)
Paleontological Resources	Less than Significant with Mitigation	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Similar (Less than Significant)	Similar (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)

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Greenhouse Gas Emissions										
Greenhouse Gas Impacts - Emissions	Less than Significant	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Greater (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Greater (Less than Significant)	Greater (Less than Significant)
Greenhouse Gas Impacts – Consistency with Plans	Less than Significant	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)	Less (Less than Significant)
Hazards and Hazardous Materials										
Transport, Use, or Disposal of Hazardous Materials	Less than Significant	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Accidental Release of Hazardous Materials	Less than Significant with Mitigation	Less than Significant with Mitigation	Less (No Impact)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Use of Hazardous Materials within One-Quarter Mile of a School	Less than Significant with Mitigation	Less than Significant with Mitigation	Less (No Impact)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Hazardous Materials Sites	Ni Impact	Ni Impact	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)
Emergency Response Plans	Less than Significant	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Greater (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Greater (Less than Significant)	Greater (Less than Significant)
Hydrology and Water Quality										
Water Quality Standards and Groundwater Quality - Construction	Less than Significant	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)
Water Quality Standards and Groundwater Quality- Operation	Less than Significant	Less than Significant	Greater (No Beneficial Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)

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Decreases in Groundwater Supplies	Less than Significant	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Alteration of Drainage Pattern Construction	Less than Significant	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)
Alteration of Drainage Pattern Operation	Less than Significant	Less than Significant	Greater (No Beneficial Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Pollutant Release in Flood Hazard, Tsunami, or Seiche Zones	Less than Significant	Less than Significant	Greater (No Beneficial Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Implementation of Water Quality Control Plans	Less than Significant	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Land Use and Planning										
Land Use and Planning Impacts	Less than Significant	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Noise										
Noise Standards Construction	Significant and Unavoidable with Mitigation	Significant and Unavoidable with Mitigation	Less (No Impact)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)	Similar (Significant and Unavoidable with Mitigation)
Noise Standards Operation	Less than Significant	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Groundborne Vibration and Human Annoyance Construction	Significant and Unavoidable with Mitigation	Significant and Unavoidable with Mitigation	Less (No Impact)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)	Similar (Significant and Unavoidable with Mitigation)

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Groundborne Vibration and Human Annoyance Operation	Less than Significant	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Population and Housing										
Population and Housing Impacts	Less than Significant	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)	Similar (Less than Significant)
Public Services										
Fire Protection	Less than Significant	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Greater (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)	Greater (Less than Significant)
Police Protection	Less than Significant	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)
Schools	Less than Significant	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant	Greater (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)	Greater (Less than Significant)

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Use or Feature	Project	Project With the Hotel Option	Alternative 1: No Project/No Build Alternative	Alternative 2: Development under Existing Zoning	Alternative 3: Reduced Maximum Height	Alternative 4: Office, Hotel and Commercial	Alternative 5: Proposed Community Plan Update-Compliant	Alternative 6: Above-Grade Parking	Alternative 7: Primarily Office	Alternative 8: Office, Residential, and Commercial
Parks	Less than Significant	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less than Project (Less than Significant) Greater than Project with East Site Hotel Option (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Less than Project (Less than Significant Greater than Project with East Site Hotel Option (Less than Significant)
Libraries	Less than Significant	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less than Project (Less than Significant Greater than Project with East Site Hotel Option (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Less than Project (Less than Significant) Greater than Project with East Site Hotel Option (Less than Significant)
Transportation										
Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities	Less than Significant	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)	Greater (Less than Significant)	Similar (Less than Significant)
Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)	Less than Significant	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)

TABLE V-15
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Use or Feature	Project	Project With the Hotel Option	Alternative 1: No Project/No Build Alternative	Alternative 2: Development under Existing Zoning	Alternative 3: Reduced Maximum Height	Alternative 4: Office, Hotel and Commercial	Alternative 5: Proposed Community Plan Update-Compliant	Alternative 6: Above-Grade Parking	Alternative 7: Primarily Office	Alternative 8: Office, Residential, and Commercial
Design Hazards	Less than Significant	Less than Significant	Greater (No Beneficial Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Emergency Access	Less than Significant	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Tribal Cultural Resources										
Tribal Cultural Resources Impacts	Less than Significant	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)
Utilities and Service Systems – Water, Wastewater, and Solid Waste										
Wastewater	Less than Significant	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Water Supply	Less than Significant	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Solid Waste	Less than Significant	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Greater (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)	Greater (Less than Significant)
Energy Conservation and Infrastructure										
Efficient Energy Consumption	Less than Significant	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Conflict with Plans for Renewable Energy	Less than Significant	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Relocation or Expansion of Energy Infrastructure	Less than Significant	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)

Source: ESA, 2020.

TABLE V-16
ABILITY OF ALTERNATIVES TO MEET PROJECT OBJECTIVES

	Ability to Meet Project Goal/Objective								
Project Objective	**Project**	**Alternative 1: No Project/No Build Alternative**	**Alternative 2: Development under Existing Zoning**	**Alternative 3: Reduced Maximum Height**	**Alternative 4: Office, Hotel and Commercial**	**Alternative 5: Proposed Community Plan Update Compliant**	**Alternative 6: Above-Grade Parking**	**Alternative 7: Primarily Office**	**Alternative 8: Office, Residential and Commercial**
1. Redevelop the Project Site, with a mixed-use development that protects the architectural and historical heritage of the Capitol Records Complex and activates Hollywood Boulevard, Vine Street, and surrounding streets through connected, publicly available landscaped open space, including a paseo with shopping, seating, open air dining, and art installations, and plazas accommodating performances and community focused events.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Fully Meets Objective	Partially Meets Objective	Partially Meets Objective	Partially Meets Objective	Partially Meets Objective	Fully Meets Objective
2. Create a hub of activity surrounding the Capitol Records Complex and the intersection of Hollywood Boulevard and Vine Street, by activating the eastern end of Hollywood Boulevard and the terminus of the Hollywood Walk of Fame, to increase engagement with the Capitol Records Complex.	Fully Meets Objective	Does Not Meet Objective	Partially Meets Objective	Fully Meets Objective	Partially Meets Objective	Partially Meets Objective	Fully Meets Objective	Partially Meets Objective	Fully Meets Objective
3. Develop architecturally distinct buildings that are compatible with the Capitol Records Complex through a design that responds to the Capitol Records Building's modernist architectural character, and preserve views of the Capitol Records Building	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Partially Meets Objective	Partially Meets Objective	Fully Meets Objective	Partially Meets Objective	Partially Meets Objective	Fully Meets Objective

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TABLE V-16
ABILITY OF ALTERNATIVES TO MEET PROJECT OBJECTIVES

Project Objective	Ability to Meet Project Goal/Objective								
	Project	**Alternative 1: No Project/No Build Alternative**	**Alternative 2: Development under Existing Zoning**	**Alternative 3: Reduced Maximum Height**	**Alternative 4: Office, Hotel and Commercial**	**Alternative 5: Proposed Community Plan Update Compliant**	**Alternative 6: Above-Grade Parking**	**Alternative 7: Primarily Office**	**Alternative 8: Office, Residential and Commercial**
4. Maintain prominent views of the Capitol Records Building by providing building setbacks, visual buffers, open space between the Project's new buildings and the Capitol Records Complex, and safe public viewing areas from the proposed paseo and plazas, to maximize view corridors and continue showcasing its distinctive architectural design.	Fully Meets Objective	Does Not Meet Objective	Partially Meets Objective	Partially Meets Objective	Partially Meets Objective	Partially Meets Objective	Partially Meets Objective	Partially Meets Objective	Fully Meets Objective
5. Promote local, regional, and State land use and mobility objectives and reduce vehicle miles traveled (VMT) by maximizing infill development within an existing Regional Center near jobs, retail, and entertainment in proximity to transit and transportation infrastructure that encourages pedestrian activity.	Fully Meets Objective	Does not Meet Objective	Partially Meets Objective	Fully Meets Objective	Fully Meets Objective	Partially Meets Objective	Fully Meets Objective	Fully Meets Objective	Fully Meets Objective
6. Provide affordable senior housing with outdoor spaces in proximity to public transportation, allowing an age-specific demographic to continue to live in their residence of preference while maintaining access to services and goods.	Fully Meets Objective	Does not Meet Objective	Does not Meet Objective	Fully Meets Objective	Does not Meet Objective	Fully Meets Objective	Fully Meets Objective	Does not Meet Objective	Fully Meets Objective

TABLE V-16
ABILITY OF ALTERNATIVES TO MEET PROJECT OBJECTIVES

Project Objective	Ability to Meet Project Goal/Objective								
	Project	**Alternative 1: No Project/No Build Alternative**	**Alternative 2: Development under Existing Zoning**	**Alternative 3: Reduced Maximum Height**	**Alternative 4: Office, Hotel and Commercial**	**Alternative 5: Proposed Community Plan Update Compliant**	**Alternative 6: Above-Grade Parking**	**Alternative 7: Primarily Office**	**Alternative 8: Office, Residential and Commercial**
7. Cluster jobs and housing near transit by locating a high-density, mixed-use development within a Transit Priority Area.	Fully Meets Objective	Does Not Meet Objective	Partially Meets Objective	Fully Meets Objective	Partially Meets Objective	Fully Meets Objective	Fully Meets Objective	Partially Meet Objective	Fully Meets Objective
8. Support the growth of the City's economic base through the introduction of an economically viable project which creates a significant number of construction and permanent jobs.	Fully Meets Objective	Does Not Meet Objective	Partially Meets Objective	Fully Meets Objective	Fully Meets Objective	Partially Meets Objective	Fully Meets Objective	Fully Meets Objective	Fully Meets Objective
9. Activate the Hollywood area with commercial opportunities that could serve local employees, generate local tax revenues, and provide new permanent jobs and housing for residents in support of local business.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Fully Meets Objective	Partially Meets Objective	Partially Meets Objective	Fully Meets Objective	Partially Meets Objective	Fully Meets Objective
10. Incorporate sustainable and green building design and construction to promote resource conservation, including waste reduction, efficient water management techniques, and conservation of energy to achieve a LEED-Gold equivalent building.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Fully Meets Objective	Fully Meets Objective	Fully Meets Objective	Fully Meets Objective	Fully Meets Objective	Fully Meets Objective

SOURCE: ESA, 2020.

VI. Other CEQA Considerations

1. Significant Unavoidable Impacts

As identified in Chapter IV, *Environmental Impact Analysis*, of this Draft EIR, the significant and unavoidable impacts under the Project and the Project with the East Site Hotel Option would be essentially the same. Accordingly, the below discussion applies to both the Project and the Project with the East Site Hotel Option.

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe significant environmental impacts that cannot be avoided, including those effects that can be mitigated but not reduced to a less-than-significant level. Following is a summary of the impacts associated with the Project that were concluded to be significant and unavoidable in Chapter IV, *Environmental Impact Analysis*, of this Draft EIR.

- **Cultural Resources (Historic Architectural Resources).** There is potential for significant impacts due to temporary construction vibration and settlement effects on certain off-site historical resources (specifically the Pantages Theatre, Avalon Hollywood, and 6316-24 Yucca Street/Art Deco Building storefront). While mitigation provided would avoid significant impacts on the Capitol Records Building and Gogerty Building and would provide similar protections to the other buildings subject to potential structural damage from vibration and settlement, Mitigation Measure CUL-MM-2, presented in Section IV.C, *Cultural Resources*, and Mitigation Measure NOI-MM-4, presented in Section IV.I, *Noise*, of this Draft EIR, would require the consent of other property owners who may not agree to participate in the mitigation measures; therefore, it is conservatively concluded that structural vibration and settlement impacts on certain historical resources adjacent to the Project Site would remain significant and unavoidable. Due to the potential for other related projects in the nearby vicinity to be under construction concurrent with the Project, structural vibration impacts to off-site historical resources are also considered cumulatively significant and unavoidable in association with the Pantages Theatre.
- **Construction Noise and Vibration.** Although implementation of Mitigation Measures NOI-MM-1 and NOI-MM-2, presented in Section IV.I, *Noise*, of this Draft EIR would reduce on-site construction noise to the extent technically feasible, temporary construction noise impacts on nearby sensitive receptors would remain significant and unavoidable at noise-sensitive receptors 1, 3, and 5 through 13, which are as follows:

1. Multi-family residential uses along Ivar Avenue and north of Yucca Street. Approximately 170 feet from the West Site and 350 feet from the East Site construction area.
3. Argyle House (apartments) at the southwest corner of Yucca Street and Argyle Avenue.
5. Multi-family residential uses to the east of Argyle Avenue approximately 530 feet from the West Site and 80 feet from the East Site construction area.
6. American Music and Dramatic Academy (AMDA) Vine Building immediately adjacent to the West Site and approximately 220 feet from the East Site construction area.
7. The AMDA Tower Building is located on the northwest corner of Yucca Street and Vine Street and approximately 125 feet from the West Site and 295 feet from the East Site construction area.
8. Eastown multi-family residential uses to the east of Argyle Avenue approximately 530 feet from the West Site and 80 feet from the East Site construction area.
9. Pantages Theatre approximately 280 feet southeast of the West Site and adjacent to the south of the East Site construction area.
10. The Lofts (Hollywood Equitable Building) at Hollywood Boulevard and Vine Street includes multi-family residential uses to the east of Vine Street approximately 280 feet southeast of the West Site and 100 feet south of the East Site construction area.
11. h Club Los Angeles to the west of Vine Street approximately 100 feet south of the West Site and 90 feet west of the East Site construction area.
12. The Knickerbocker Senior Residential use to the east of Ivar Avenue approximately 90 feet south of the West Site and 300 feet west of the East Site construction area.
13. Multi-family residential uses (including the St. Elmo Apartments at 6358 Yucca Street) to the west of Ivar Avenue approximately 140 feet west of the West Site and 650 feet west of the East Site construction area.

Due to the potential for other related projects in the nearby vicinity to be under construction concurrent with the Project, temporary construction noise impacts to off-site sensitive receptors 1, 3, and 5 through 13 are also considered cumulatively significant and unavoidable.

Although implementation of a Construction Traffic Management Plan (refer to Project Design Feature TRAF-PDF-2 in Section IV.L, *Transportation*, of this Draft EIR) would include street closure information, a detour plan, haul routes and a staging plan, concrete trucks and construction worker vehicles would not

be subject to the City-approved haul route. Since there are no feasible mitigation measures to impose restrictions for concrete trucks and construction worker vehicles, noise impacts to off-site sensitive receptors along Yucca Street between Argyle Avenue and N. Gower Street, would be temporarily significant and unavoidable. Due to the potential for other related projects in the nearby vicinity to be under construction concurrent with the Project, temporary construction noise impacts to off-site sensitive receptors due to construction trucks and worker vehicles along Yucca Street between Argyle Avenue and N. Gower Street, and potentially along other roadway segments, are also considered cumulatively significant and unavoidable.

While implementation of Mitigation Measure NOI-MM-4, presented in Section IV.I, *Noise*, of this Draft EIR, could reduce potential impacts associated with structural damage to off-site buildings (both historic and non-historic) to less-than-significant levels, since the measure requires the consent of other property owners, who may not agree, it is conservatively concluded that structural vibration impacts would be significant and unavoidable because it cannot be assured that all components of the measure can be implemented on the following vibration sensitive receptors:

3. Argyle House
6. AMDA Vine Building
9. Pantages Theatre
14. Art Deco Building (6320 Yucca)
15. Avalon Hollywood
20. Commercial Building at 1718 Vine Street

Due to the potential for certain other related projects in the nearby vicinity to be under construction concurrent with the Project, structural vibration impacts on the Pantages Theatre are also considered cumulatively significant and unavoidable.

Vibration impacts regarding human annoyance at the nearby noise sensitive receptors would exceed significance thresholds for nearby residential and institutional uses. Although mitigation measures to reduce these impacts, such as installation of a wave barrier (essentially a subterranean sound barrier to reduce noise), were considered, they were determined infeasible. Therefore, temporary vibration impacts from on-site construction associated with human annoyance would be significant and unavoidable at the following vibration sensitive receptors:

3. Argyle House (apartments)
5. Multi-family residential uses to the east of Argyle Avenue

6. AMDA Vine Building
8. Eastown multi-family residential uses
9. Pantages Theatre
10. The Lofts (Hollywood Equitable Building)
11. h Club Los Angeles
12. The Knickerbocker Building (senior residential use) to the east of Ivar Avenue approximately 90 feet south of the West Site and 300 feet west of the East Site construction area.
13. Multi-family residential uses (including the St. Elmo Apartments at 6358 Yucca Street) to the west of Ivar Avenue approximately 140 feet west of the West Site and 650 feet west of the East Site construction area.

Due to the potential for Related Project No. 2 (a proposed hotel at 1718 N. Vine Street) to be under construction concurrent with the Project, vibration impacts associated with human annoyance are also considered cumulatively significant and unavoidable at the Pantages Theatre.

2. Reasons Why the Project is Being Proposed, Notwithstanding Significant Unavoidable Impacts

As identified in Chapter IV, *Environmental Impact Analysis*, of this Draft EIR, the significant and unavoidable impacts under the Project and the Project with the East Site Hotel Option would be essentially the same, the below discussion applies to both the Project and the Project with the East Site Hotel Option.

In addition to identification of the Project's significant unavoidable impacts, CEQA Guidelines Section 15126.2(c) also requires a description of the reasons why a project is being proposed, notwithstanding significant unavoidable impacts associated with the project. As described further below, this Project is being proposed, notwithstanding its significant and unavoidable impacts, because: (1) the Project would achieve a considerable number of regional and community land use and mobility objectives, including those that promote mixed-use, in-fill development within a Transit Priority Area (TPA); (2) the Project would provide needed housing to serve the local area and the region; and (3) the Project would provide economic benefits to and support the revitalization of the Hollywood community.

The Project includes a number of characteristics that are consistent with, and contribute to, the implementation of local, regional, and State land use and mobility objectives. The Project would, pursuant to those objectives, contribute to the redevelopment of the Project Site with a mixed-use development that protects the

architectural and historical heritage of the Capitol Records Complex, and activates Hollywood Boulevard, Vine Street, and surrounding streets through connected publicly accessible landscaped open space, which could accommodate performances and community-focused events. The Project would also create a hub of activity surrounding the Capitol Records Complex and activate the eastern end of Hollywood Boulevard and the terminus of the Hollywood Walk of Fame. The Project would maintain prominent views of the Capitol Records Complex and develop architecturally distinct buildings that are compatible with the Capitol Records Complex.

The Project's location and design would help improve the environment and health of residents by facilitating a reduction in per capita vehicle miles traveled (VMT) and air pollution, by maximizing infill development within an existing Regional Center and a TPA, near jobs, retail, and existing transit. The Project would facilitate transit and active transportation through intensifying development within approximately 600 feet of the Los Angeles County Metropolitan Transportation Authority (Metro) Red Line Hollywood/Vine Station and proximate to numerous regional Metro bus lines and local Los Angeles Department of Transportation (LADOT) Downtown Area Short Hop (DASH) lines, in support of Southern California Association of Governments (SCAG) goals set forth in the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS). The Project would also incorporate sustainable and green building design and construction to promote resource conservation, including waste reduction, efficient water management techniques, and conservation of energy.

The Project has been certified by the Governor as an Environmental Leadership Development Project (ELDP).[1] Such projects must meet high sustainability standards and provide specified economic benefits to the region. The Project would meet the requirements for certification as an ELDP, as a mixed-use development on an urban infill site that would achieve the United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Gold Certification (or better), maximize transit friendly features, be 'Net-Zero' in carbon/greenhouse gas (GHG) emissions, and result in a minimum investment in California of $100 million.

The Project would increase the supply and improve the quality of housing for various income and age groups, especially for persons with low and moderate incomes, in that it would provide up to 1,005 new housing units, including up to 133 senior affordable housing units.

The Project would support the growth of the City's economic base by creating jobs in both Project construction and operation. The Project would create commercial opportunities that could serve local employees, generate local tax revenues, and

[1] The Project was certified by the Governor on August 18, 2018, with concurrence by the State's Joint Legislative Budget Committee on September 17, 2018.

provide new permanent jobs and housing for residents in support of local businesses.

For all the reasons stated above, the Project is being proposed, notwithstanding its significant unavoidable impacts. It should also be noted that the Project's significant and unavoidable noise and vibration impacts are associated with temporary and periodic construction activities, similar to those occurring at development sites in urban areas, particularly within infill locations. Furthermore, the proposed mitigation measures to address significant and unavoidable structural vibration impacts to historic and non-historic buildings could reduce these impacts to a less-than-significant level; however, as components of the mitigation measures would require the consent of other property owners, who may not agree, these impacts are conservatively concluded to be significant and unavoidable.

3. Significant Irreversible Environmental Changes

As the significant irreversible environmental changes under the Project and the Project with the East Site Hotel Option would be essentially the same, the below discussion applies to both the Project and the Project with the East Site Hotel Option.

According to CEQA Guidelines Sections 15126(c) and 15126.2(c), an EIR is required to address any significant irreversible environmental changes that would occur should the proposed project be implemented. As stated in CEQA Guidelines Section 15126.2(c) indicates:

> *Uses of non-renewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter likely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the Project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*

The Project would necessarily consume limited, slowly renewable and non-renewable resources. This consumption would occur during the construction phase of the Project and would continue throughout its operational lifetime. Project development would require a commitment of resources that would include: (1) building materials, (2) fuel and operational materials/resources, and (3) the transportation of goods and people to and from the Project Site. Project construction would require the consumption of resources that are non-

replenishable or may renew so slowly as to be considered non-renewable. These resources would include the following construction supplies: certain types of lumber and other forest products; aggregate materials used in concrete and asphalt, such as sand, gravel and stone; metals, such as steel, copper, and lead; petrochemical construction materials such as plastics; and water. Furthermore, non-renewable fossil fuels, such as gasoline and oil, would also be consumed in the use of construction vehicles and equipment, as well as the transportation of goods and people to and from the Project Site.

Project operation would continue to expend non-renewable resources that are currently consumed within the City. These include energy resources, such as electricity and natural gas, petroleum-based fuels required for vehicle-trips, fossil fuels, and water. Fossil fuels would represent the primary energy source associated with both construction and ongoing operation of the Project, and the existing, finite supplies of these natural resources would be incrementally reduced.

At the same time, through the intensification of development within the TPA, the Project would support a land use pattern that would reduce reliance on private automobiles, VMT, and the consumption of non-renewable resources when considered in a larger context. Most notably, the Project would provide high density housing along a mixed-use corridor containing commercial, restaurant, office, and entertainment activities. The Project Site is located within a City-designated TPA, a SCAG-designated High Quality Transit Area (HQTA), and an area identified as preferred for high density development to reduce VMT and related consumption of renewable resources, among other goals. Given its location, the Project would support pedestrian access to a considerable range of employment, retail, and entertainment activities. The Project also provides excellent access to the regional transportation system as it is located in proximity to the Metro Red Line station and numerous regional and local Metro bus lines and LADOT DASH bus lines. These factors would contribute to a land use pattern that is considered to reduce the consumption of non-renewable resources.

Furthermore, the Project would include design features and be subject to building regulations that would reduce the demands for energy resources needed to support Project operation. The Project would comply with the Los Angeles Green Building Code and 2019 CALGreen Code, and achieve the equivalent of the USGBC LEED Gold level. The Project Site would be readily accessible by several public transit options, including numerous City bus lines and rail at the Metro Red Line Hollywood/Vine Station. A Transportation Demand Management (TDM) Program would be implemented to reduce the Project's single occupant vehicle trips and increase the trips arriving via alternative modes of transportation (e.g., walking, bicycle, carpool, vanpool, and transit). The TDM Program would include design features, transportation services, education, and incentives intended to reduce the amount of single occupant vehicles during commuter peak hours. The TDM Program may include, but is not limited to, unbundled parking; daily parking

discounts for Metro commuters; transit subsidies; upgrades or repairs to sidewalks en-route to the Metro Red Line Hollywood/Vine Station; rideshare programs and parking; and an integrated pedestrian network within and adjacent to the Project Site that is transit-, bike-, and pedestrian-friendly. Additionally, the Project would provide on-site short- and long-term bicycle parking on both the West and East Sites, located in consideration of the roadway network. The Project would incorporate water conservation and rainwater management strategies, such as high efficiency water fixtures, greywater and rainwater capture systems, green roofs on the Senior Buildings and residential amenity decks, and water-permeable paving. As part of a hybrid strategy to mitigate urban heat island effects, the Project would not include any uncovered at-grade parking. The Project would also utilize light-colored, reflective paving materials, and roof and grade-level vegetation. All selected plant and tree species would be drought-tolerant.

The analysis of Project impacts on GHG emissions in Section IV.E, *Greenhouse Gas Emissions*, of this Draft EIR and the following discussion of energy, below, provide a discussion of State efforts to reduce emissions and energy consumption, which also requires concurrent reductions in the consumption of non-renewable resources. As indicated in Section IV.E, *Greenhouse Gas Emissions*, the Project would result in a less-than-significant GHG impacts with the reductions specified above. In addition, the Project would be consistent with the State's Assembly Bill (AB) 32 GHG reduction target and would result in a less-than-significant impact with respect to consistency with applicable plans, policies, or regulations to reduce GHG emissions. The Project would achieve several objectives of the City's General Plan Framework Element, SCAG 2016-2040 RTP/SCS, L.A. Green New Deal, and South Coast Air Quality Management District Air Quality Management Plan (AQMP) for establishing a regional land use pattern that promotes sustainability.

The Project would support pedestrian activity in the Hollywood area and contribute to a land use pattern that addresses housing needs and reduces vehicle trips and air pollution by locating residential uses within an area that has public transit (with access to the Metro rail lines and existing regional bus service). Employment opportunities, restaurants, and entertainment venues are within walking distance. Further, the Project's inclusion of bicycle parking, as discussed above, would encourage the use of alternative modes of transportation. Continued use of non-renewable resources would be on a relatively small scale and consistent with regional and local growth forecasts in the area, as well as State and local goals for reductions in the consumption of such resources. Furthermore, the Project would not affect access to existing resources or interfere with the production or delivery of such resources. The Project Site contains no energy resources that would be precluded from future use through Project implementation. The Project's irreversible changes to the environment related to the consumption of non-renewable resources would not be significant.

4. Growth-Inducing Impacts

As the growth-inducing impacts under the Project and the Project with the East Site Hotel Option would be essentially the same, the below discussion applies to both the Project and the Project with the East Site Hotel Option.

CEQA Guidelines Section 15126.2(e) requires an EIR to discuss the ways a proposed project could foster economic or population growth or the construction of additional housing, directly or indirectly, in the surrounding environment. Growth-inducing impacts include the removal of obstacles to population growth (e.g., the expansion of a wastewater treatment plant allowing more development in a service area) and the development and construction of new service facilities that could significantly affect the environment individually or cumulatively. In addition, pursuant to CEQA, growth must not be assumed as beneficial, detrimental, or of little significance to the environment. As discussed in Chapter I, *Introduction*, of this Draft EIR, and as presented in Appendix C (Senate Bill 375 Memorandum), of this Draft EIR, the Project qualifies for CEQA streamlining per SB 375 and PRC Section 21159.28 which specifically states that the EIR shall not be required to discuss "growth inducing impacts" (PRC Section 21159.28(a). Accordingly, this assessment of growth-inducing impacts is provided for informational purposes.

The Project would include up to 1,005 residential units (872 market-rate units and 133 senior affordable units), approximately 68,869 square feet of indoor residential amenities and lobbies, approximately 33,922 square feet of publicly accessible open space, and approximately 30,176 square feet of restaurant/retail space. The mixed-use Project would provide new housing and employment opportunities within a Regional Center, an area targeted for high-density development and near existing employment centers. The Project would provide housing for 2,433 new residents and generate 206 new employees.

The Project with the East Site Hotel Option would maintain the same West Site as under the Project but would replace 104 residential units within the East Building with a 220-room hotel. The number of affordable residential units within the East Senior Building would be proportionally reduced by 17 units. Overall, the Project with the East Site Hotel Option would develop 884 residential housing units (768 market-rate units and 116 senior affordable housing units) with an approximately 220-room hotel with approximately 130,278 square feet of floor area, and 30,176 square feet of other commercial floor area (retail and restaurant uses. The Project with the East Site Hotel Option would provide housing for 2,140 new residents and generate 445 new employees.

Although the Project would also generate construction jobs, as further described in Section IV.J, *Population and Housing*, of this Draft EIR, for a number of reasons,

it is not likely that construction workers would relocate their households as a consequence of temporary construction employment at the Project Site.

As further described in Section IV.L, *Transportation*, Section IV.N.1, *Wastewater*, Section IV.N.2, *Water*, and Section IV.N.3, *Solid Waste*, of this Draft EIR, there is adequate infrastructure to serve the Project, and no significant impacts due to expanded infrastructure would occur.

The Project would include a mix of uses that would be compatible with adjacent uses and representative of the type of high density and mixed-use development anticipated under the existing Regional Center designation. As further described in Section IV.J, *Population and Housing*, of this Draft EIR, the Project's increase in population, housing, and employment would continue an infill growth pattern that is encouraged locally in the City's plans and regionally by SCAG policies and would be well within the projected growth forecasts for the City and region. Rather than being unplanned, the Project's growth in population, housing, and employment would align with infill development priorities within TPAs consistent with State, regional, and local policies. As such, the potential for physical impacts on the environment due to unplanned population, housing, and employment growth would be less than significant.

The Project would not have indirect effects on growth through such mechanisms as the extension of roads and infrastructure, since the infill Project is located in an urbanized area that is served by current infrastructure (e.g., roads and utilities), and community service facilities. As further described in Section IV.L, *Transportation*, Section IV.N.1, *Wastewater*, Section IV.N.2, *Water*, and Section IV.N.3, *Solid Waste*, of this Draft EIR, the Project's only off-site infrastructure improvements would consist of tie-ins to the existing utility main-lines already serving the Project area. Therefore, the Project would not require the construction of off-site infrastructure that would induce growth and development in new areas. In addition, as further described in Section IV.K.1, *Fire Protection*; Section IV.K.2, *Police Protection*; Section IV.K.3, *Schools*; Section IV.K.4, *Parks and Recreation*; and, Section IV.K.5, *Libraries*, of this Draft EIR, the Project would not tax existing community service facilities such that construction of new facilities would be required that would impact the environment.

Therefore, the Project would not directly or indirectly induce growth other than that already anticipated. The Project's contribution to growth would also not be cumulatively considerable. As further evaluated in Section IV.J, *Population and Housing*, of this Draft EIR, related projects considered in association with the Project also represent infill development that would be served by available infrastructure and would result in growth falling within projected growth forecasts for the City and the region.

5. Potential Secondary Effects

As the potential secondary effects under the Project and the Project with the East Site Hotel Option would be essentially the same, the below discussion applies to both the Project and the Project with the East Site Hotel Option.

CEQA Guidelines Section 15126.4(a)(1)(D) requires mitigation measures to be discussed in less detail than the significant effects of the proposed project if the mitigation measure(s) would cause one or more significant effects in addition to those that would be caused by the project as proposed. The analysis of Project impacts in Chapter IV, *Environmental Impact Analysis*, of this Draft EIR resulted in recommended mitigation measures for several environmental topics, which are identified below. The following provides a discussion of the potential secondary effects on those topics that could occur as a result of implementation of the required mitigation measures. For the reasons stated below, it is concluded that the Project's mitigation measures would not result in significant secondary impacts.

a) Air Quality

Mitigation Measure AQ-MM-1 requires the Applicant to implement construction equipment features for equipment operating at the Project Site during construction activities. Such equipment includes USEPA Tier 4 Final off-road emissions standards or equivalent for equipment; electric or alternative fueled (i.e., non-diesel) tower cranes and signal boards, pole power for electric tools, alternative-fueled generators, etc.; and maintaining and operating construction equipment to minimize exhaust emissions. Mitigation Measure AQ-MM-2 requires that the Applicant schedule routine maintenance and testing of emergency generators on different days during Project operation. These mitigation measures for air quality would implement emissions control strategies that would reduce impacts to less-than-significant levels. As these mitigation measures are control strategies for different equipment for construction and operation that the Applicant would use or install, no further impacts would occur with their implementation. Therefore, these mitigation measures for air quality would not result in secondary impacts on the environment.

b) Cultural Resources

Mitigation Measure CUL-MM-1 would provide for appropriate treatment and preservation of the Hollywood Walk of Fame during construction of the Project. The implementation of the mitigation measure would occur only during construction and only during any potential disturbance to the Hollywood Walk of Fame. Mitigation Measure CUL-MM-2 would provide shoring system design and monitoring of excavation, grading, and shoring during Project construction. The mitigation measure requires documentation of existing conditions, construction monitoring, and other procedures during excavation, grading, and shoring activities to avoid damage to buildings proximate to the Project Site. These

mitigation-related activities would occur on and adjacent to the Project Site as part of overall construction and would not result in secondary effects.

For archaeological resources, Mitigation Measure CUL-MM-3 requires the retention of a Qualified Archaeologist prior to ground-disturbing activities. Mitigation Measure CUL-MM-4 requires that upon discovery of archaeological resources, all ground-disturbing activities shall be halted or diverted, and the Qualified Archaeologist shall establish a 50-foot buffer within which construction activities shall not be allowed to continue. All archaeological resources shall be evaluated by the Qualified Archaeologist. Mitigation Measure CUL-MM-5 requires that the Qualified Archaeologist document any description of resources and treatment within a report for the City and the South Central Coastal Information Center, as well as any appropriate representatives as needed.

As Mitigation Measures CUL-MM-1 through MM-CUL-5 are in place to ensure protection of the Hollywood Walk of Fame and that any potential discovery of archaeological resources is well-documented, no further impacts would occur from the documentation and monitoring. These mitigation measures for historical and archaeological resources would reduce impacts and would not result in secondary impacts on the environment.

c) Geology and Soils

For paleontological resources, Mitigation Measure GEO-MM-1 requires the retention of a Qualified Paleontologist. Mitigation Measure GEO-MM-2 requires the Qualified Paleontologist to conduct construction worker paleontological resources sensitivity training prior to the start of ground disturbing activities. Mitigation Measure GEO-MM-3 requires that paleontological resources monitoring be conducted for all ground disturbing activities occurring in previously undisturbed sediments which have high sensitivity for encountering paleontological resources. The Qualified Paleontologist shall prepare a final monitoring and mitigation report for submittal to the City in order to document the results of the monitoring effort and any discoveries. As Mitigation Measures GEO-MM-1 through GEO-MM-3 are in place to ensure that qualified experts are available for sensitivity training and construction monitoring to prevent potential impacts, no further impacts would occur. These mitigation measures for paleontological resources would reduce impacts and would not result in secondary impacts on the environment.

d) Hazards and Hazardous Materials

Mitigation Measure HAZ-MM-1 requires the retention of a qualified environmental consultant to prepare a Soils Management Plan (SMP) for Los Angeles Department of Building and Safety approval prior to the commencement of excavation and grading activities. The SMP shall describe specific soil- and underground storage tank-handling controls required to comply with federal, State, and local overseeing agencies; prevent unacceptable exposure to contaminated

soils or vapors during construction; and prevent the improper disposal of contaminated soils or steel structures. As Mitigation Measure HAZ-MM-1 is in place to ensure containment of hazardous materials, no further impacts would occur. This mitigation measure would reduce impacts and would not result in secondary impacts on the environment.

e) Noise

Mitigation Measure NOI-MM-1 requires that all noise and vibration equipment, whose specific location may be flexible, be located at least 100 feet away from the nearest off-site sensitive receptors, or that natural and/or manmade barriers be used to screen propagation of noise from such equipment towards those nearest off-site sensitive land uses. Mitigation Measure NOI-MM-2 requires that the Project contractor use construction equipment with state-of-the-art noise shielding and muffling devices and also prohibits impact pile driving. NOI-MM-2 also requires that sound control curtains be placed around all drilling apparatuses, drill rigs, and jackhammers when in use. Mitigation Measure NOI-MM-3 requires that a construction liaison shall be provided to inform the nearby receptors 1, 3, and 5 through 13 when peak noise and vibration activities are scheduled to occur. Notification to these receptors should be provided two weeks prior to commencement of construction at the Project Site.

Mitigation Measure NOI-MM-4 requires the retention of a licensed building inspector or structural engineer to perform structural vibration monitoring during Project construction at the AMDA Vine Building, Argyle House, Capitol Records Building, Gogerty Building, Pantages Theatre, Avalon Hollywood, and 6316-24 Yucca Street/Art Deco Building Storefront. Inspection and documentation at the historic buildings shall be carried out in coordination with a qualified preservation consultant. Additionally, NOI-MM-4 requires the retention of a qualified acoustical engineer and/or structural engineer to develop and implement a vibration monitoring program during site demolition and grading/excavation to document the construction-related ground vibration levels at the buildings listed above. During construction, vibration monitoring systems shall be placed at the receptor building facades closest to Project construction activity to continuously measure and store the peak particle velocity (PPV) in inch/second. The systems shall provide real-time alerts when vibration levels exceed the preset levels as determined in NOI-MM-4. In the event any damage occurs to the historic buildings, such materials shall be repaired in consultation with a qualified preservation consultant, and, if warranted, in a manner that meets the Secretary of the Interior's Standards.

As the mitigation measures are implemented to ensure that construction noise and vibration impacts would not impact the receptors, no further impacts would result from these mitigation measures. These mitigation measures for noise and vibration would reduce impacts and would not result in secondary impacts on the environment.

6. Impacts Found Not to be Significant

As the impacts found not to be significant under the Project and the Project with the East Site Hotel Option would be essentially the same, the below discussion applies to both the Project and the Project with the East Site Hotel Option.

CEQA Guidelines Section 15128 states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the Draft EIR. Such a statement may be contained in an attached copy of an Initial Study. An Initial Study was prepared for the Project and is included in Appendix A-1 of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each topical area is or is not analyzed further in the Draft EIR. The City determined that the Project would result in less-than-significant or no impacts related to agricultural resources, biological resources, landslides, septic systems, flooding, habitat conservation plans, mineral resources, airstrips or airport proximity or plans, population or housing displacement, schools, and air traffic patterns. For further discussion of these issues and more detailed evaluation of potential impacts, refer to the Project's Initial Study, provided in Appendix A-1 of this Draft EIR.

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e) Historic Resources

Historic Resources Group
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11110 Ohio Avenue, Suite 204
Los Angeles, CA 90025

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700 South Flower Street, Suite 2100
Los Angeles, CA 90017

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1990 S. Bundy Drive, # 400
Los Angeles, CA 90025

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Group Delta Consultants
32 Mauchly, Suite B
Irvine, CA 92618

- Michael D. Reader, CEO, Principal Geotechnical Engineer

i) Environmental Site Assessment

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1725 Victory Boulevard,
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4. Agencies Consulted

a) City of Los Angeles Bureau of Sanitation (LA Sanitation)

Wastewater Engineering Services Division
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Los Angeles, CA 90039

- Ali Poosti, Division Manager

b) Los Angeles Department of Water and Power (Water Supply Assessment)

Water Resources Division
111 N. Hope Street, Room 308
Los Angeles, California 90051-5700

- Jim Hwang, Civil Engineering Associate

c) Los Angeles Department of Transportation

Development Services Division
100 South Main Street, 9th Floor
Los Angeles, California 90012

- Wes Pringle, Transportation Engineer

d) Los Angeles Fire Department

Bureau of Fire Prevention and Public Safety
201 N. Figueroa Street, Suite 300
Los Angeles California 90012

- Ralph M. Terrazas, Fire Chief
- Kristin Crowley, Fire Marshal Bureau of Fire Prevention and Public Safety

e) Los Angeles Police Department

Office of Chief of Police
P.O. Box 30158
Los Angeles, California 90030

- Michel R. Moore, Chief of Police
- Darnell D. Davenport, Captain, Commanding Officer, Community Outreach and Development Division
- Christopher Gibson, Officer, Community Outreach and Development Division

f) Los Angeles Unified School District

Facilities Services Division: School Management Services, Master Planning and Demographics
333 S. Beaudry Avenue, 23rd Floor
Los Angeles, CA 90017

- Gwenn Godek, CEQA Advisor
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g) Los Angeles Department of Recreation and Parks

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221 N. Figueroa Street, Suite 350
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- Michael A. Shull, General Manager
- Darryl Ford, Senior Management Analyst II
- Melinda Gejer, City Planning Associate
- Los Angeles Public Library

Los Angeles Public Library
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- Thomas Jung, Senior Management Analyst I
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IX. Acronyms and Abbreviations

Term	Description
AB	Assembly Bill
ACC	Advance Clean Cars Program
ACM	Asbestos Containing Material
ACTM	Airborne Toxic Control Measures
ADA	Americans with Disabilities Act
ADT	Average Daily Traffic
AEP	Association of Environmental Professionals
AERMOD	USEPA/AMS Regulatory Model
AES	Acoustical Engineering Services, Inc.
afy	Acre-feet per Year
AMDA	American Musical and Dramatic Academy
AMI	Advanced Metering Infrastructure
APC	Area Planning Commission
APN	Assessor Parcel Number
AQMD	Air Quality Management District
AQMP	Air Quality Management Plan
ASF	Age Sensitivity Factors
ASHRAE	American Society of Heating, Refrigerating and Air-Conditioning Engineers
ASTM	American Society for Testing and Materials
ATCM	Airborne Toxic Control Measure
BACT	Best Available Control Technology
BAU	Business-as-Usual
BEN	Bicycle Enhanced Network
BEP	Business Emergency Plan
BID	Business Improvement District
BLN	Bicycle Lane Network
BMP	Best Management Practice
BOE	Bureau of Engineering
BOH	Back-of-House
BTU	British Thermal Unit
CAA	Federal Clean Air Act

Term	Description
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
CalRecycle	California Department of Resources, Recycling, and Recovery
CAPA	The California Art Preservation Act
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CAT	Climate Action Team
CBC	California Building Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CEC	California Energy Commission
CEQA	California Environmental Quality Act
cf	Cubic Feet
CFR	Code of Federal Regulations
CGS	California Geological Survey
CHL	California Historical Landmarks
CHRIS	California Historical Resources Information System
CIP	Capital Improvement Program
CiSWMPP	City of Los Angeles Solid Waste Management Policy Plan
CIWMB	California Integrated Waste Management Board
CMP	Construction Management Plan
CNEL	Community Noise Equivalent Level
CNRA	California Natural Resources Agency
COG	Council of Governments
COMPSTAT	Crime Control Model Computer Statistics
CPC	City Planning Commission
CPHI	California Points of Historical Interest
CPIO	Community Plan Implementation Overlay
CPUC	California Public Utilities Commission
CRA	Community Redevelopment Agency
CREC	Controlled Recognized Environmental Conditions
CSE	Countywide Siting Element
CVC	California Vehicle Code
CWA	Clean Water Act
CWC	California Water Code

Term	Description
cy	Cubic Yard
DASH	Downtown Area Short Hop
DCP	Department of City Planning
DDT	Dichloro-diphenyl-trichloroethane
dB	Decibles
dBA	A-weighted Decibels
DLA	Designated Local Authority
DNL	Day-night Average Noise Level
DOGGR	California Division of Oil, Gas, and Geothermal Resources
DOSH	Division of Occupational Safety and Health
DPM	Diesel Particulate Matter
DTSC	California Department of Toxic Substances Control
EDR	Environmental Data Resources, Inc.
EIR	Environmental Impact Report
EISA	Energy Independence and Security Act
ELDP	Environmental Leadership Development Project
EMD	City of Los Angeles Emergency Management Department
EMFAC	Emission Factors
EMS	Emergency Medical Services
EOO	Emergency Operations Organization
EOP	Emergency Operations Plan
EPA	Environmental Protection Agency
ESA	Environmental Science Associates
ESL	Environmental Screening Levels
EVSE	Electric Vehicle Supply Equipment
EWMP	Enhanced Watershed Management Programs
FAR	Floor Area Ratio
FED	Functional Equivalent Document
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FINDS	Facility Index System/Facility Registry System
FIRM	Flood Insurance Rate Maps
FPS	Fire Preemption System
FSD	Facilities Services Division
FTA	Federal Transit Administration

Term	Description
FYE	Fiscal-year Ending
GBUAPCD	Great Basin Unified Air Pollution Control District
GHG	Greenhouse Gas
GRYD	Gang Reduction and Youth Development
GSA	Groundwater Sustainability Agency
GWh	Gigawatt-hour
GWP	Global Warming Potential
HCM	Historic-Cultural Monument
HFC	Hydrofluorocarbons
HHWE	Household Hazardous Waste Element
HIN	High Injury Network
HPOZ	Historic Preservation Overlay Zone
HQTA	High Quality Transit Area
HRA	Health Risk Assessment
HREC	Historical Recognized Environmental Condition
HRG	Historic Resources Group
HRI	California State Historic Resources Inventory
HSC	California Health and Safety Code
HSSUD	Hollywood Signage Supplemental Use District
HVAC	Heating/Ventilating/Air Conditioning
HWCL	Hazardous Waste Control Law
HWRP	Hyperion Waste Reclamation Plant
Hz	Hertz
IFFAR	Information of Fire Flow Availability Request
IIPP	Injury and Illness Prevention Program
IPCC	Intergovernmental Panel on Climate Change
IRP	Integrated Resources Plan
ITE	Institution of Transportation Engineers
IWMA	Integrated Waste Management Act
kWh	Kilowatt-hour
LAA	Los Angeles Aqueducts
LADBS	Los Angeles Department of Building and Safety
LADOT	Los Angeles Department of Transportation
LADPW	Los Angeles Department of Public Works
LADWP	Los Angeles Department of Water and Power

Term	Description
LADWRP	Los Angeles Department of Waste
LAFD	Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAPD	Los Angeles Police Department
LAPL	Los Angeles Public Library
LARWQCB	Los Angeles Regional Water Quality Control Board
LASAN	Los Angeles Bureau of Sanitation
LAUSD	Los Angeles Unified School District
LAX	Los Angeles International Airport
LBP	Lead-based Paint
LCFS	Low Carbon Fuel Standard
LEED	Leadership in Energy and Environmental Design
L_{eq}	Equivalent Sound Level
LEV	Low-emission Vehicle
LID	Low Impact Development
LORS	Laws, Ordinances, Regulations, and Standards
LOS	Level of Service
MATES	Multiple Air Toxics Exposure Study
MERV	Minimum Efficiency Reporting Value
MLD	Most Likely Descendent
MMP	Mitigation Monitoring Program
MND	Mitigated Negative Declaration
MODRAT	Modified Rational Method
MPO	Metropolitan Planning Organization
MPP	Manual of Policies and Procedures
MWD	Metropolitan Water District
MWh	Megawatt-hour
MXD	Mixed-Use
NAAQS	National Ambient Air Quality Standards
NAHC	National American Heritage Commission
NAT	No-Action-Taken
NDFE	Non-disposal Facility Element
NEN	Neighborhood Enhanced Network
NHMLAC	Natural History Museum of Los Angeles County
NHPA	National Historic Preservation Act

Term	Description
NHTSA	National Highway Traffic Safety Administration
NOA	Notice of Availability
NOC	Notice of Completion
NOI	Notice of Intent
NOP	Notice of Preparation
NO_x	Nitrogen Oxide
NPDES	National Pollutant Discharge Elimination System
OAM	Original Art Murals
OEHHA	Office of Health Hazard Assessment
OEM	County of Los Angeles Office of Emergency Management
OES	California Governor's Office of Emergency Services
OHP	Office of Historic Preservation
OHR	Office of Historic Resources
OPA	Owner Participation Agreement
OPR	California State Office of Planning and Research
OSHA	Federal Occupational Safety and Health Administration
PCB	Polychlorinated Biphenyls
PCE	Perchloroethylene
PDF	Project Design Feature
PED	Pedestrian Enhanced Districts
PEIR	Program Environmental Impact Report
PEV	Plug-in Electric Vehicle
PHEV	Plug-in Hybrid Electric Vehicle
PLUM	Planning and Land Use Management Committee
PM2.5	Fine Particulate Matter
PM10	Respirable Particulate Matter
PPV	Peak Particle Velocity
PRC	Public Resources Code
PRP	Public Recreation Plan
RAP	City of Los Angeles Department of Recreation and Parks
RCNM	Roadway Construction Noise Model
RCP	Reinforced Concrete Pipe
RCRA	Resources Conservation and Recovery Act
REC	Recognized Environmental Concern
RENEW LA	Recovering Energy, Natural Resources and Economic Benefit from Waste for

Term	Description
	Los Angeles Plan
RFS	Renewable Fuel Standard
RHNA	Regional Housing Needs Assessment
RMS	Root Mean Square
RPS	Renewable Portfolio Standard
RTP	Regional Transportation Plan
RUWMP	Regional Urban Water Management Plan
RWQCB	Regional Water Quality Control Board
SAFE	Safer Affordable Fuel-Efficient
SAR	Second Assessment Report
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	Southern California Air Quality Management District
SCAR	Sewer Capacity Availability Review
SCCIC	South Central Coastal Information center
SCH	State Clearinghouse
SCLC	Southern California Library Cooperative
SCS	Sustainable Communities Strategy
SDWA	Safe Drinking Water Act
SFBRWQCB	San Francisco Bay Regional Water Quality Control Board
SGMA	Sustainable Groundwater Management Act
SIP	State Implementation Plan
SLF	Sacred Lands File
SMGB	State Mining and Geology Board
SMP	Soil Management Plan
SoCalGas	Southern California Gas Company
SOON	Surplus Off-Road Option for NO_x
SQMP	Stormwater Quality Management Program
SRRE	Source Reduction and Recycling Element
SSMP	Sewer System Management Plan
SUSMP	Standard Urban Stormwater Mitigation Plan
SVP	Society of Vertebrate Paleontologists
SWAT	Special Weapons and Tactics
SWIRP	Solid Waste Integrated Resources Plan
SWP	State Water Project

Term	Description
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminants
TAG	Transportation Assessment Guidelines
TAZ	Traffic Analysis Zones
TDM	Transportation Demand Management
TEN	Transit Enhanced Network
TeNS	Technical Noise Supplemental
TMDL	Total Maximum Daily Loads
TMO	Transportation Management Organization
TNM	Traffic Noise Model
TOC	Transit Oriented Communities
TOD	Transit Oriented District
TPA	Transit Priority Area
tpd	Tons per Day
TPH	Total Petroleum Hydrocarbons
TPP	Transit Priority Project
TSCA	Toxic Substances Control Act
TTP	Terminal Island Water Reclamation Plant
TWRP	Tillman Water Reclamation Plant
UCLA	University of California, Los Angeles
USEPA	United States Environmental Protection Agency
USGBC	United States Green Building Council
USGBC	United States Green Building Council
USGS	United States Geological Service
UST	Underground Storage Tank
UWMP	Urban Water Management Plan
VCP	Vitrified Clay Pipe
VdB	Decibel Notation
VDECS	Verified Diesel Emission Control Strategies
VEC	Vapor Encroachment Condition
VEN	Vehicle Enhanced Network
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds
VTT	Vesting Tentative Tract Map

Term	Description
W	Watts
WH	Watt-hours
WMA	Watershed Management Area
WMC	Watershed Management Committees
WMP	Watershed Management Program
WSA	Water Supply Assessment
WSV	Water Supply Verification
WWECP	Wet Weather Erosion Control Plan
ZEV	Zero-emission Vehicle
ZIMAS	City of Los Angeles Zoning Information and Mapping Access System

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